

Advanced Heat Treat Corp.

Corporate Office & Service Center 2825 MidPort Blvd., Waterloo, IA 50703 800/383-5221 ● 319/232-5221 ● FAX 319/232-4952

http://www.ahtweb.com

March 6, 2008

Edwin G. Buckner, P.E. AWMD/RESP U.S. Environmental Protection Agency 901 North 5th St. Kansas City, KS 66101

RE: Advanced Heat Treat Corp., Burton Ave., Waterloo IA (EPA ID IAD056504186) Response to 08/15/07 EPA Contractor RCRA Inspection Allegations

Dear Mr. Buckner:

Enclosed is Advanced Heat Treat Corporation's (AHTC) response to EPA's Letter of Warning/Request for Information received by AHTC on February 12, 2008. The response and attachments are identified per the requirements of page 5 of the warning letter.

AHTC contends that the allegation in "Violation 1" is incorrect, and that the data provided show that AHTC was a conditionally exempt small quantity generator of hazardous waste in the period identified in the noted "Violation 1." The data and explanation for this contention are provided in the attachment labeled "Advanced Heat Treat Corp. (AHTC) Response to EPA Letter of Warning/Request for Information – 02/0708." It is AHTC's contention that due to errors in estimating waste volumes prior to November 2006, it has in fact been a CESQG since, at the latest July 04 (after the shipment of the drum of hazardous waste generated in January 03. Consequently some of EPA's request for information is incomplete due to this contention, since AHTC has always considered itself to be a CESQG.

Please contact Ron Kane of AHTC at 319-232-5221 or our environmental consultant at 563-370-4831 with any questions regarding this response.

Sincerely

Gary Sharp

President and CEO

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Advanced Heat Treat Corp. (AHTC) Response to EPA Letter of Warning/Request For Information dated 02/0708.

Violation 1

Documents reviewed in responding to this item include Hazardous Waste Manifests for degreaser solvent and Degreaser "Monthly Solvent Consumption Logs (MSCL) from August 2001 to December 2007. The MSCL's and manifests for these dates are enclosed with the response along with a spreadsheet summarizing the data in these documents as "Response to Violation 1".

Persons consulted for responding to this item were Ron Kane and Gayla Hoppenworth of AHTC.

Attachment I is a summary of the hazardous waste manifest data and the Monthly Solvent Consumption Logs (MSCL). The gallons of shipments recorded by the recycling firm and the gallons and mass of the amount of degreaser solvent (trichloroethylene or TCE) removed are shown in columns 2 and 3. The shipments are highlighted in blue and the Monthly Solvent Consumption Logs are highlighted in yellow. The "Waste Drum Shipped/Comment" column shows which drums were shipped when base on best available information.

A review of this data shows that AHTC was always one drum out of phase from drum generated to drum shipped; e.g. the July 04 shipment of two drums included the waste degreaser cleanouts of Jan 03 and Feb 02. The May 04 drum was left on site. Another fact that is apparent is that AHTC shipped only partially full drums. Every degreaser cleanout resulted in the use of a new hazardous waste drum. These drums were only about 1/3 full, but were manifested as 55 gallons each time. The recycling firm provided the manifests completed before the waste pickup, and AHTC signed them. A review of the data in Attachment I show that the drums could not have been full when shipped. The data show that every time a degreaser cleanout occurred, a new drum was used until November 06 when the waste material generated during the cleanout started to be weighed.

At the time of the inspection, two drums of degreaser hazardous waste were on site – one dated Sept. 12, 2006 and the other one which the Report of RCRA Compliance Evaluation Inspection" on page 3 said was "believed" to be "marked with an accumulation start date of March 25, 2006." A review of the data in the March 05 MSCL shows that this drum was initially started on March 25, 2005, not 2006. The inspection report on page 3 notes that the Sept. 12, 2006 drum was "approximately 1/3 full." This supports the contention that a new drum is used every time the degreaser is cleaned out. The March 25, 2005 drum was full, however.

Beginning in November 06, AHTC initiated the procedure of weighing the waste material generated by the degreaser cleanouts. When the March 25, 2005 drum was weighed, it was noted to be only 1/3 full and so two additional degreaser cleanouts were placed into the drum using it as a satellite accumulation drum. Both drums of waste were shipped immediately after the RCRA inspection (08/21/07 manifest) a full March 25, 2005 drum and a 1/3 full September 12, 2006 drum. There was no waste on site after that time until the degreaser was cleaned out in December 07 generating 189 pounds of hazardous waste.

The actual degreaser cleanouts, when weighed since Nov 06 have consistently been below 100 kgs. The three cleanouts since that time have averaged 79.1 kgs. The degreaser cleanout volumes recorded prior to this time were estimated by the operator in multiples of 5 gallons. AHTC contends that these estimates were highly inaccurate. Prior to Nov 06, the data was mainly kept for the purpose of demonstrating NESHAP compliance. Since AHTC is well within their permit limits, accuracy was not at a premium for this purpose. Since 2003, the estimate for every degreaser cleanout has been 20 gallons. AHTC contends that this figure could just have easily been 15-18 gallons. The only accurate data available are for the last three cleanouts, where the gallons generated have been in the range of 11.9 to 15.5 gallons. AHTC contends that the more accurate data support the contention that the volume estimates were high. Therefore, AHTC contends that for all practical purposes, it has been a CESQG since at least July of 2004 when the estimated 25 gallon cleanout of February 02 was shipped.

Furthermore, from the data presented, at a minimum, it is clear that AHTC has been a CESQG since August 07 after shipping all on site hazardous waste. AHTC also notes that since August 01, the degreaser cleanout has occurred 10 times (244 lbs estimated), once every 8 months. The other 67 months had waste generation of 0 kg. The FR Vol. 81, No. 56, page 10153 (March 24, 1986) discussed generator status for "episodic generators." The following is stated:

"The Agency has always taken the position that a generator may be subjected to different standards at different times, depending on his generation rate in a given calendar month. Thus a generator of less than 100 kg in one calendar month would be deemed a conditionally exempt generator in that month, subject only to the requirements of 261.5; however, if in the next calendar month, he generates more than 100 kg but less than 1000 kg of any regulated hazardous waste, he is subject to all of the standards being promulgated today, as his generator status has changed."

AHTC is a classic episodic generator. Though the FR states that a generator is subject to the higher generator status requirements in the month when the waste is generated, in point of fact this is not practical, unless the generator chooses to forego all regulatory benefits of the lower generator status. To assure compliance, the facility would always have to maintain its status at the higher generator status. Because the Agency allows generator status to be determined

monthly, it does not seem reasonable that the Agency intended that the generator should be held to a continual higher standard.

Responses to the remaining "Requested Information" items are affected by the above contentions.

Requested Information

The following information was obtained from AHTC records, Ron Kane, Steve Grimm, and Gayla Hoppenworth - employees of AHTC - and was prepared by AHTC's environmental consultant, Gary Douglas.

During the August 15, 2007 inspection, the AHTC hazardous waste storage area was temporarily located in the storage building north of the production building. The drums were relocated from their normal location due to a plant expansion and a lack of space. The pictures presented in this response show the hazardous waste drum where it is normally located on a "hazardous waste cart" that also holds a tote for storing used oil. There is a three inch solid welded metal lip around the edge of the cart to retain any leaks or spills. The cart is kept about 25 feet west of the vapor degreaser. The cart is wheeled to the degreaser when it has to be drained. As the pictures show, there is emergency communication, written emergency procedures, a fire extinguisher and spill cleanup materials located in the immediate area.

- 1. The monthly solvent consumption logs are provided in the response to Violation 1. All solvent logs from August 01 to December 07 are provided in a clipped together package. The summary spreadsheet for these documents and the manifest are also included.
- The manifests for waste solvents are provided in the response to Violation
 These are provided in a stapled batch labeled "AHTC Information Request 2."
- 3. Inspections have been performed since February 23, 2007 and are reported the form enclosed entitled "Weekly Hazardous Waste Storage Inspection Checklist" and is marked "AHTC Information Request 3. Since generator status can be determined month to month, and currently AHTC is a CESQG, these inspections are not now required.
- 4. AHTC has an Emergency Action Plan to comply with 29 CFR 1910.38(a). This document is attached and marked as "AHTC Information Request 4. The plan includes a diagram of fire extinguisher locations, which are numerous throughout the plant. Emergencies are announced through an alarm or PA system. An air horn is kept beside the hazardous waste cart (used oil and waste TCE) for emergency communication. All employees have been trained as to its location. A photo of the air air horn, located above the fire extinguisher can be seen in the picture. The hazardous

- waste cart is immediately behind the column. Another photo shows a posted SPCC Plan, air horn, and phone marked "AHTC Information Request 4" located in the production office.
- 5. The Emergency Action Plan includes the last three months of fire extinguisher inspections to show that they maintain an active charge and are regularly inspected. A picture of on site spill control equipment is shown in the photograph labeled "AHTC Information Request 5" is enclosed. The spill equipment is located about 20 feet south of the hazardous waste cart. The last three pages of the Emergency Action Plan are the last three months of completed fire extinguisher inspections.
- 6. Employee handling HW See picture presented in Item 4.
- 7. No arrangements have been made with local authorities, as AHTC has always believed it to be a CESQG based on the analysis presented under "Violation 1," and not requiring this action.
- 8. The emergency coordinator for the facility is Ron Kane as well as three back up coordinators. The section of the facility SPCC plan that contains this information as well as spill response notification and response procedures is included and labeled "AHTC Information Request 8." The SPCC plans spill response procedures are considered to be the same for any hazardous waste spill. A picture labeled "Information Request 8" shows the energency coordinator list attached to the hazardous waste cart.
- 9. See item 4.

Advanced Heat Treat Corp. Waste Generation

Month	lbs TCE (Gal)	Manifested off site - gal	Which waste drum shipped/Comments
August-01	731		Estimated 30 Gallons removed from degreaser twice
September-01	0		
October-01	0	55	HW drum shipped 1 Aug. 01 of the 2 drums generated
November-01	0		
December-01	0		
January-02	0		
February-02	304		Estimated 25 Gallons removed from degreaser
March-02	0	55	shipped second drum from Aug 01
April-02	0		
May-02	0		
June-02	0		
July-02	0		
August-02	0		
September-02	0		
October-02	0		
November-02	0		
December-02	0		
January-03	244		Estimated 20 gallons removed from degreaser
February-03	0		J
March-03	0		
April-03	0		
May-03	0		
June-03	0		
July-03	0		
August-03	0		
September-03	0		
October-03	0	1 1127 1 70 1	
November-03	0		
December-03	0		
January-04	0		
February-04	0		
March-04	0		
April-04	0		
May-04	244		Estimated 20 gallons removed from degreaser
June-04	0		
July-04	0	110	shipped drums from Jan 03 and Feb 02 degreaser cleanouts
August-04	0	110	ompress diding from ball to and Feb 02 degreaser dearious
September-04	0		
October-04	0		
November-04	0		
December-04	0		
January-05	0		
February-05	0		
March-05	244		Estimated 20 gallons removed from dographor
April-05	0		Estimated 20 gallons removed from degreaser
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May-05 June-05	0		
	0		
July-05	0		
August-05	0		
September-05 October-05	0		
November-05	0		
December-05	0		

Advanced Heat Treat Corp. Waste Generation

Response to Violation 1

Month (Gal) site - gal Which waste drum shipped/Comments January-06 0 55 shipped May 04 drum degreaer cleanout February-06 0 March-08 0 March-08 0 April-06 0 June-06 0 July-06 0 July-06 0 Sep 06 drum 1/3 full shipped August 07 after inspection Observed Sep 06 drum 1/3 full shipped August 07 after inspection Use of the full still on site and shipped Aug 07 after inspection/Estimated 20 Gallons removed from degreent inspection/Estimated	
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AHTC Information Request 1

ADVANCED HEAT TREAT CORP. MONTHLY SOLVENT CONSUMPTION LOG

MONTH: August 2001 MACHINE I.D.#: LARGE SMALL FACILITY: IA / MI (Circle appropriate vessel or facility.)

DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
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4				
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26				
27	30	30	Ø	Bm/RK
28				/ 11
29				
30				
31				
TOTAL	Α	В	С	

Total monthly solvent usage A - (B + C).	
3 month rolling average:	
Yearly total:	

Revised: 11 March 1997

MONTHLY SOLVENT CONSUMPTION LOG

MONTH: September 2001 MACHINE I.D.#: LARGE / EMALL FACILITY: IA MI (Circle appropriate vessel or facility.)

acility.)				
DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
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3			# ¹	
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30				
31				
TOTAL	Α	В	С	

Total monthly solvent usage A - (B + C):	_
3 month rolling average:	_
Yearly total:	_

MONTHLY SOLVENT CONSUMPTION LOG

MONTH: October 2001 MACHINE I.D.#: LARGE / SMALD FACILITY: 1A/ MI (Circle appropriate vessel or

facility.)

DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
10-29-01	106Al			AZ LJ
2				
3				
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31				
TOTAL	A	В	С	

Total monthly solvent usage A - (B + C):	
3 month rolling average:	_
Yearly total:	_

MONTH: November 2001 MACHINE I.D.#: LARGE SMALL FACILITY: IA / MI (Circle appropriate vessel or facility.)

facility.)				
DAY	AMOUNT OF SOLVENT ADDED (lbs. / gai.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
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TOTAL	A	В	С	
	othly solvent usage A - (B +	C):	Revised: 11 March 1997	7 53

-	
•	Total monthly solvent usage A - (B + C):
	3 month rolling average:
	Yearly total:

MONTH: <u>December 2001</u> MACHINE I.D.#: <u>LARGE / SMALL</u> FACILITY: <u>IA / MI</u> (Circle appropriate vessel or facility.)

DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1				
2				
3				
4				
5				
6				
7				
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9		2		
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31				
TOTAL	А	В	С	

Total monthly solvent usage A - (B + C):	
3 month rolling average:	
Yearly total:	

MONTHLY SOLVENT CONSUMPTION LOG

MONTH: January 2002 MACHINE I.D.#: LARGE (SMALL) FACILITY: IA MI (Circle appropriate vessel or

DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
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3		ATT		
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24				***************************************
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28				
29				
30				
31				
TOTAL	A	В	С	

Revised: 11 March 1997

30		
31		
TOTAL	А	В
	nthly solvent usage A - (B + rolling average: tal:_	C):

MONTHLY SOLVENT CONSUMPTION LOG

MONTH: February 2002 MACHINE I.D.#: LARGE SMALL FACILITY: (A J/MI (Circle appropriate vessel or facility.)

DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
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23				9
24	-			
25				
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27				
28				
29				
30				
31		,		
TOTAL	A 3θ	B 25	C 1 B	

Total monthly solvent usage A - (B + C): (54×12.5) - 1 = (14) lbs (545at) Revised: 11 March 1997	Z.53
3 month rolling average:	
Yearly total:	

MONTHLY SOLVENT CONSUMPTION LOG

MONTH: March 2002 MACHINE I.D.#: LARGE SMALL FACILITY: (IA)ML (Circle appropriate vessel or facility.)

DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
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TOTAL	A 4	В	С	

	31						
	TOTAL	Α	4		В		
•	Total mor	nthly	solvent	usage A - (B	+ C): _	4 Gal.	
	3 month r	rolling	g averag	ge:			
	Yearly to	tal:					

Revised: 11 March 1997

MONTHLY SOLVENT CONSUMPTION LOG

MONTH: April 2002 MACHINE I.D.#: LARGE / SMALL FACILITY IA/MI (Circle appropriate vessel or facility.) AMOUNT OF SOLVENT AMOUNT OF **AMOUNT OF** DAY ADDED (lbs. / gal.) SOLVENT DRAINED SOLIDS REMOVED INITIALS

Revised: 11 March 1997

MONTHLY SOLVENT CONSUMPTION LOG

MONTH: May 2002 MACHINE I.D.#: LARGE SMALL FACILITY IA MI (Circle appropriate vessel or facility.)

DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1				
2	0			
3				
4				
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31			,	
TOTAL	A 5	В	С	

11			1	
30				
31				
TOTAL	A 5	В	С	
3 month i	nthly solvent usage A - (B + rolling average: tal:	C):5 3al.	Revised: 11 March 1997	

MONTHLY SOLVENT CONSUMPTION LOG

MONTH: June 2002 MACHINE I.D.#: LARGE / SMALL FACILITY: IA/ MI (Circle appropriate vessel or facility.)

DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
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2				
3				
4	4 gal			05
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30				
31				
TOTAL	A 4	В	С	

Z.53

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11		
31		
TOTAL	A 4	В
	nthly solvent usage A - (B + rolling average: tal:_	C): 4 Gal.

MONTHLY SOLVENT CONSUMPTION LOG

MONTH: July 2002 MACHINE I.D.#: LARGE SMALL FACILITY: IA MI (Circle appropriate vessel or facility.)

DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
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20				
21				
22				
23		-	*	
24				
25				
26				
27				
28				
29		:		
30				
31				
TOTAL	A D	В	С	

31						
TOTAL	Α	D	В		С	
3 month r	nthly solvent u rolling average tal:	isage A - (B + ∋:	C):	2	2	Revised: 11 March 1997

MONTHLY SOLVENT CONSUMPTION LOG

MONTH: August 2002 MACHINE I.D.#: LARGE SMALL FACILITY: (A) MI (Circle appropriate vessel or facility.)

DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1	* *	v		
2				
3		4 2		
4)		
5			,	
6				
7		,		
8				
9		2		
10				
11				
12		-		
13				
14				
15		g g		
16	8 gal.			TP
17	J			/ /
18	0			
19	*			
20				
21				
22			9	
23				
24				
25				
26	а п			
27				
28				
29				
30				
31				
TOTAL	A	В	С	

29				
30				
31				
TOTAL	А	В	С	
3 month i	nthly solvent usage A - (B + rolling average: tal:_		Revised: 11 March 1997	Z.53

MONTH: September 2002 MACHINE I.D.#: LARGE MALL FACILITY: JA MI (Circle appropriate vessel or facility.)

facility.)				
DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1	The Tall			
2		_		,
3	7gal.	ϕ	6	TP/ODP
4	1	/		7
5				
6	6991	Ø	8	MH
7	J	•		
8				
9				
10				
11	×.	e		
12				
13				
14				
15				
16				
17		# F _{2.77}		
18		8		100
19				
20		a		
21				
22				
23				
24				
25	NO.			
26			1	
27				
28				
29				
30				
31				
TOTAL	A BSali	B (7) (+)	С	

Revised: 11 March 1997

31						
TOTAL	Α	13 5ali		В		
	rolling	solvent usa g average:_	age A - (B +	C): _	13 stal.	-

MONTHLY SOLVENT CONSUMPTION LOG

MONTH: October 2002 MACHINE I.D.#: LARGE SMALL FACILITY: (IA) MI (Circle appropriate vessel or facility.)

DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1				
2				
3				
4				
5				
6				
7				
8				
9				
10				
11				
12				
13				
14				
15				
16				
17				
18		8		
19				
20				
21				
22				
23		-		
24				
25				
26				
27				
28				
29				
30	9		2	
31				
TOTAL	Α	В	С	

я				
3				
A	В	С		
olling average:			Revised: 11 March 1997	Z.53
(othly solvent usage A - (B + olling average:	ithly solvent usage A - (B + C):	olling average:	olling average: Revised: 11 March 1997

MONTHLY SOLVENT CONSUMPTION LOG

MONTH: November 2002 MACHINE I.D.#: LARGE / SMALL FACILITY IA MI (Circle appropriate vessel or facility.)

facility.)				
DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1				
2				
3				
4		T T		
5	9			
6	2			
7			- 20	
8				
9				
10				
11				
12				
13		3		
14				
15				
16				
17	2.4			***************************************
18				
19	7			
20	10 Gallons	0	0	Sm
21	10 GAHONS 10 Aallons	0	O	NT
22			2	
23				
24				
25				
26				
27				
28				
29				
30				
31				
TOTAL	A 20 Sal.	В	cO	

31						
TOTAL	A 20 50%	В	0	С	0	
	nthly solvent usage A - (B rolling average:	+ C):	20 591,		Revised: 11 March 1997	Z.53
Yearly to					¥.	

ADVANCED HEAT TREAT CORP.

MONTHLY SOLVENT CONSUMPTION LOG BLOW

MONTH: December 2002 MACHINE I.D.#: LARGE / SMALL FACILITY: MACHINE I.D.#: M

acility.)				
DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1	,			
2	7 Careous	0	Ø	op
3				
4				
5				
6		3 , v		
7				
8	· 10 GAILONS	0	0	Sm
9	•			
10			ı	
11 .	* P	ı		
12		2 2		
13	1 et	N I		
14		5 er		
15				
16				
17			1	
18		2	. Zen	
19	N E	i	and the state of t	
20				
21				
22				
23				
24				
25				
26			0	
27				
28				
29		9		
30				
31	146	_		
TOTAL	A 1) 391.	В	C O	

Total monthly solvent usage A - (b + C).	17 491
3 month rolling average:	
Yearly total:	

MONTHLY SOLVENT CONSUMPTION LOG

MONTH: January 2003 MACHINE I.D.#: LARGE SMALL FACILITY A MI (Circle appropriate vessel or facility.)

acility.)				
DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1-7-03	30 gal,	20 gal	5 LBS	Db
2/-16-03	6 64	0 1	7)	07
3/-19-03	15 9A1	0	0	AZ
4/27/3	3 6a/	p	0	12
5				
6	6			
7	74.5		2	
8			M .	w
9	2			
10	Ĭ,	,	je.	
11				
12		e 2		
13		201 6	ч ,	
14		v	: ¥	
15				
16				
17				6
18	· 4. ·	8 y	. •.	
19		and the second s		
20				
21	,			
22		4 27		
23				
24		9		
25		<u> </u>		
26		ž		
27			5	
28	4			
29				
30				
31		1 0		
	A 54	B 20	c 0.5	

	31								
	TOTAL	Α	54			В	20		
	Total mor	nthly	solven	t usage	A - (B +	C):		10 5N	33.5
	3 month r	ollin	g avera	ige:					
8	Yearly total:								
	•								

MONTH: February 2003 MACHINE I.D.#: LARGE / SMALL FACILITY: AA MI (Circle appropriate vessel or facility.)

facility.)				
DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1			6	
2				
3	2			
4				
5				
6	5 gal		The state of the s	NT
7	J			
8				
9		F		
10				
11				
12				
13				
14		1		
15		•		
16			,	
17				
18				
19				
20				
21				
22				
23				
24		7		
25				
26		2		
27			y	
28				
29				
30				
31				
TOTAL	Α	В	С	

Revised: 11 March 1997

30						
31						
TOTAL	A	В				
Total monthly solvent usage A - (B + C):						

Burton

MONTH: March 2003 MACHINE I.D.#: LARGE / SMALD FACILITY: (IA)/ MI (Circle appropriate vessel or facility.) AMOUNT OF SOLVENT AMOUNT OF **AMOUNT OF INITIALS** ADDED (lbs. / gal.) SOLVENT DRAINED **SOLIDS REMOVED** DAY 36# 3gals Sm/LI 6-gailous d: 11 March 1997 Z.53

31	u č			-
TOTAL	Α	В	С	
	nthly solvent usage A - (B + rolling average: tal:_	C):95d	æ	Revised

MONTHLY SOLVENT CONSUMPTION LOG

MONTH: April 2003 MACHINE I.D.#: LARGE (SMALL) FACILITY: A MI (Circle appropriate vessel or facility.)

DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1				
2				
3	,			
4				
5				
6				
7				
8				
9				
10		î		
11			*	
12				
13				
14	5 gal	¥	1.5 % &	De
15	0			
16				
17		8		
18				
19				
20		×		
21				
22				
23	7		•	
24				
25				
26			5 10 28	
27	v .		2	
28				
29				
30				
31				
TOTAL	Α	В	С	

lotal monthly solvent usage A - (B + C):	3 GAV	
3 month rolling average:		_
Yearly total:		_

Revised: 11 March 1997

ADVANCED HEAT TREAT CORP.

MONTHLY SOLVENT CONSUMPTION LOG

MONTH: May 2003 MACHINE I.D.#: LARGE SMALL FACILITY: AV MI (Circle appropriate vessel or facility.)

DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1				
2				
3				
4				
5				
6				
7				
8				
9				
10		5		
11				
12				
13	*			
14				
15				
16		6.	. 8	
17				
18				
19				
20				
21				
22				
23			e p	
24				
25				
26	A			
27	10 gal			21
28	,		*	
29		а		
30				
31	P ₁			
TOTAL	A	В	С	

23		4		
30		* .		
31	4			
TOTAL	Α	В	С	
3 month i	nthly solvent usage A - (B + rolling average: tal:	C):	,	Revised: 11 March 1997

MONTHLY SOLVENT CONSUMPTION LOG

MONTH: June 2003 MACHINE I.D.#: LARGE / \$MALL FACILITY: IA/MI (Circle appropriate vessel or facility.)

DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1				
2				
3				
4				
5	8 gel			
6	7.00	*		23
7				
8		1		
9				
10		4		
11	4			
12				
13	ı			
14		, F		
15			4 v. 40	
16			~~ .¥	
17				
18		3		
19	6		¥.	
20				
21			2	
22				
23				
24				
25				
26			3.4	
27				
28				
29		5	¥	
30				
31				
TOTAL	A	В	С	

30		9	8	
31		×-		
TOTAL	A	В	С	
	nthly solvent usage A - (B + rolling average: tal:_	Revised: 11 March 1997	Z.53	

MONTH: July 2003 MACHINE I.D.#: LARGE / SMALL FACILITY: IA / MI (Circle appropriate vessel or facility.)

DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1				
2				
3				
4				
5	2			
6				
7	10 gal			DS
8	0			3
9				
10		¥	e e	
11				
12		i siya wa As	me set	
13			1 1	
14				
15				
16				
17			100	
18	,			
19			٧	
20				
21		, .	31 - 5-	
22	*	·· ·	F	
23			t u	
24	1 -			
25	и			
26				
27			9	
28	-		ä	
29				
30				
31			4	
TOTAL	A	В	С	

Total monthly solvent usage A - (B +	C): <u>10</u>
3 month rolling average:	
Yearly total:	
* ************************************	

Revised: 11 March 1997

MONTH: August 2003 MACHINE I.D.#: LARGE / SMALL FACILITY: _IA / MI (Circle appropriate vessel or facility.)

DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1				
2				
3				
4				
5	15 gal	Ć	0	NT
6	J			
7				
8		4 4		
9				
10				
11	3-	0 6		
12		* ***		
13			ring of	
14				
15				
16				
17				
18		The state of the s		
19				
20				
21				
22		4		
23				
24				
25				
26				
27				
28				
29				
30				
31				
TOTAL	Α	В	С	

28				
29				
30				
31				
TOTAL	Α	В	С	
3 month r	nthly solvent usage A - (B + rolling average: tal:			Revised: 11 March 1997

MONTHLY SOLVENT CONSUMPTION LOG

MONTH: September 2003 MACHINE I.D.#: LARGE SMALL FACILITY: IA / MI (Circle appropriate vessel or facility.)

facility.)				
DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1				
2				
3				
4	-			
5				
6				
7				
8			×	
9	,			
10				
11				
12				
13				i.
14	7.5			8
15				N
16 .				
17				
18				2
19				
20			a 2	
21				
22	8 gal			08
23			5	
24				
25				
26				
27	Ša			
28	- 1			
29				
30	10 gal			NT
31				
TOTAL	А	В	С	
		0) 10 0 1		

29				
30	10 901			M
31				
TOTAL	А	В	С	
	nthly solvent usage A - (B + rolling average:_ tal:_	Revised: 11 March 1997	Z.53	

MONTH: October 2003 MACHINE I.D.#: LARGE / SMALL FACILITY: IA / MI (Circle appropriate vessel or

			,
fac	1	111/	1

facility.)		T	T	
DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1				
2	· ·			
3				
4				
5				
6				
7				
8				
9				
10				
11	-			
12				
13				
14				
15				
16				
17				
18		8		
19				
20				
21				
22				
23				
24				
25		:		
26				
27				
28	i			
29		2.		
30				
31				
TOTAL	A	В	С	
	athly achient users A /D i	C\. 1		

29				
30				
31				
TOTAL	A	В	С	
Total monthly solvent usage A - (B + C):			Revised: 11 March 1997	Z.53
3 month r	olling average:			

MONTH: November 2003 MACHINE I.D.#: LARGE / SMALL FACILITY: IA / MI (Circle appropriate vessel or

facility.) AMOUNT OF SOLVENT **AMOUNT OF** AMOUNT OF DAY ADDED (lbs. / gal.) SOLVENT DRAINED SOLIDS REMOVED **INITIALS** NA TOTAL В C

Total monthly solvent usage A - (B + C):
3 month rolling average:
Yearly total:

MONTHLY SOLVENT CONSUMPTION LOG

MONTH: December 2003 MACHINE I.D.#: LARGE/SMALL FACILITY: IA / MI (Circle appropriate vessel or

DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1				
2				
3				
4				
5	3			
6				
7				
8				
9				
10				
11				
12				
13				
14				
15	15			TIBE
16				
17				
18				
19				
20				
21				
22				
23				
24			-	
25				
26				
27				
28				
29				
30				
31				
TOTAL	А	В	С	

31		
TOTAL	А	В
	nthly solvent usage A - (B + rolling average: tal:	C): 15

ADVANCED HEAT TREAT CORP.

MONTHLY SOLVENT CONSUMPTION LOG

MONTH: January 2004 MACHINE I.D.#: LARGE SMALL FACILITY: IA / MI (Circle appropriate vessel or facility.)

facility.)				
DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1				
2				
3				
4				
5	,			
6				
7				
8		4		
9				
10				
11	3-1			
12				
13				
14				
15				
16				
17				
18				
19				
20				
21				
22				
23				
24				
25				
26				
27				
28				
29				
30				
31				2
TOTAL	Α	В	С	1

lotal monthly solvent usage A - (B + C):
3 month rolling average:
Yearly total:

ADVANCED HEAT TREAT CORP.

MONTHLY SOLVENT CONSUMPTION LOG

MONTH: February 2004 MACHINE I.D.#: LARGE / SMALL FACILITY: (IA/ MI (Circle appropriate vessel or facility.)

facility.)				
DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1	,			
2				
3				
4				
5				
6				
7				
8				
9				
10				
11				
12				
13	N.			
14				
15				
16				
17				
18				
19				
20				
21				
22			u u	
23				
24				
25				
26	:			
27				
28				
29				
30				
31				
TOTAL	А	В	С	

Total monthly solvent usage A	A - (B + C):	
3 month rolling average:		
Yearly total:		

MONTH: March 2004 MACHINE I.D.#: LARGE / SMALL FACILITY: TIA MI (Circle appropriate vessel or facility.) AMOUNT OF SOLVENT AMOUNT OF AMOUNT OF DAY ADDED (lbs. / gal.) SOLVENT DRAINED SOLIDS REMOVED **INITIALS** E С

Revised: 11 March 1997

Z.53

-			
	31		
	TOTAL	А	В
		nthly solvent usage A - (B + rolling average: tal:	C):

MONTH: April 2004 MACHINE I.D.#: LARGE / SMALL FACILITY: IA / MI (Circle appropriate vessel or facility.)

DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
13/31/04	G gal	NA	NA	BM
2				
3				
4				
5				
6		»"		
7				
8				
9				
10				
11		3		
12	ď.			
13	5 gal	NA	NH	05
14	- July -			
15				
16				
17	a a		5	
18				
19		*.		
20		,	,	
21		2°		
22				
23				
24				
25				
26			• ,	
27				
28				
29	1	· ·		
30		,		
31				
TOTAL	A	В	С	

Total monthly solvent usage A	(B + C)	
3 month rolling average:		

MONTH: May 2004 MACHINE I.D.#: LARGE / SMALL FACILITY: IA / MI (Circle appropriate vessel or facility.)

DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1				
2				
3	5	_		RS
4				
5				
6	· s			
7				
8				
9				
10				
11 💉 .			:	
12	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1			3
13				
14	1-1-1-		,	
15				
16				
17				
18				
19				
20				
21	30 gal	degal		Dm
22	//	easer Cliencel		
23				
24				
25				
26				
27				
28				
29		No. 1		
30	a tile.			là là
31				
TOTAL	A	В	С	

Total monthly solvent usa	age /	A - (B + C):		A Paris		Revised: 11 March 1997
3 month rolling average:			la de	710		
Yearly total:		ă.	਼ ਦਾ		2.50	

MONTH: June 2004 MACHINE I.D.#: LARGE / SMALL FACILITY: IA / MI (Circle appropriate vessel or facility.)

DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1				
2				
3				
4			1 2	
5				
6				
7	198			MM
8				
9				
10				
11				
12				
13	58#			Das
14				
15				
16				0.0
17	256#			JAK
18		-		
19				
20				
21				
22	g a			
23				
24			9	1
25	742-532 = 210#		,	DYR
26				
27				
28				
29	3"	A STORY OF THE STO		
30				
31				
TOTAL	A	В	С	

Total monthly solvent usage A - (B + C):	
3 month rolling average:	
Yearly total:	

Revised: 11 March 1997

Z.53

MONTH: July 2004 MACHINE I.D.#: LARGE / SMALL FACILITY: IA / MI (Circle appropriate vessel or facility.)

DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
17/30/04	5 gallon			BM
2				
3				
4				
5				
6				
7				
8				
9				
10		* · · · *		
11				
12				
13				
14				
15				
16				
17				
18				
19				
20		·		
21				
22 .				
23		6		
24				
25				
26				
27				
28				
29				
30		TW		
31				
TOTAL	A	В	C	

Total monthly solvent usage A	- (B	+ ()	•
3 month rolling average:			

MONTH: August 2004 MACHINE I.D.#: LARGE / SMALL FACILITY: IA / MI (Circle appropriate vessel or facility.)

DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	_AMOUNT OF SOLIDS REMOVED	INITIALS
18/18/04	10 gal	NA	NA	J.M.
28/26/64	11) bal.	NA	NA	Bulh
3				
4	,	*		
5				
6				
7	Septemper 2, 2,	204		
8				
9 9/2/	4 5 42/bus	NA	NA	TP/RT
10	,			
11		- Y		
12		31	-	
13			A ree	
14	· ·		"1"	
15		:		
16				
17				
18			* *	
19				
20				
21				
22	i i			
23				
24				
25				
26				
27				
28				
29				
30	,			
31				
TOTAL	A	В	С	

Total monthly solvent usage A - (B + C):
3 month rolling average:	

MONTH: September 2004 MACHINE I.D.#: LARGET SMALL FACILITY: IA/MI (Circle appropriate vessel or facility.)

facility.)				
DAY ,	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1				
2	5 gallon	NA	NA	TP/RJ
3	5 gallons	NA	NA	5R/BM
4				
5				
6				
7				
8	9			
9				
10				
11			,	
12			· ·	
13	*		,	
14			\	
15			*	
16	ь			
17				
18				
19				
20				
21				
22				
23				
24				
25				
26				
27				
28				
29				
30				
31				
TOTAL	A 15	В	С	
	the bound of the second of the	C).		

Total	monthly	solvent	usage	A -	(B +	C): .

MONTH: October 2004 MACHINE I.D.#: LARGE / SMALL FACILITY: IA MI (Circle appropriate vessel or facility.)

facility.)				
DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
110/25	5 gals.	NANE	NONE	SM
21/	5 sala	NONE	NONE	03
3	7.		·	
4				
5				
6				
7				
8				
9				
10		,		
11			, ring	
12		-		
13				
14	**			
15				
16				
17		V - K		
18				
19	9			
20				
21				
22				
23				
24	2			
25				
26				
27				
28		-		
29				
30				
31		* .		
TOTAL	А	В .	С	
	(1)			

Total monthly	solvent usage	A -	(B	+ C):	
---------------	---------------	-----	----	-------	--

MONTH: November 2004 MACHINE I.D.#: LARGE / SMALL) FACILITY: A MI (Circle appropriate vessel or facility.)

DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1-	5			
2			2 v	
3		·	*	
4				
5				
6	7,5			
7				
8				
9		·		
10			1	
11				
12				
13		*	-	
14	*	- 1	1.5.5.5	
15				
16		<i>2</i> ¥		
17				lana n
18	ь.		14	
19				# +
20	8			
21				
22				
23				
24				
25				
26				
27	•			
28		1		
29				
30				
31				
TOTAL	А	В	Ċ	

Total monthly solvent usage A -	(B	+	C	:	Revised: 11 March 1997	Z.53

3 month rolling average:

Yearly total:

ADVANCED HEAT TREAT CORP.

MONTHLY SOLVENT CONSUMPTION LOG

MONTH: December 2004 MACHINE I.D.#: LARGE / SMALL) FACILITY: (IA) MI (Circle appropriate vessel or facility.)

DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1				·
2				
3				
4				
5		,		
6				
7	,			
8		,	4 8 13	
9			#114 14 W . 333 BN	
10				
11				
12				
13				
14			ř ,	
15				
16				
17				
18				
19			-	~ .
20				
21	*		* * *	
22				
23				
24			- 19 - 91 - 17	
25	8		-	
26			Chinamay - Manageria	
27	,			
28				
29				
30				
31				
TOTAL	A	В	С	,t

Total	monthly	solvent	usage	A -	(B	+	C):	
2 ma	nth rollin	a aviora	70.					

MONTH: January 2005 MACHINE I.D.#: LARGE SMALL FACILITY IA MI (Circle appropriate vessel or

facility.) AMOUNT OF SOLVENT **AMOUNT OF** AMOUNT OF DAY ADDED (lbs. / gal.) SOLVENT DRAINED SOLIDS REMOVED **INITIALS** 1 2 3 none BM 4 5-6 gal none 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 C TOTAL Α

Total monthly solvent usage A - (B + C): 6メルーフレト

Revised: 11 March 1997

Z.53

3 month rolling average:

ADVANCED HEAT TREAT CORP.

MONTHLY SOLVENT CONSUMPTION LOG

MONTH: February 2005 MACHINE I.D.#: LARGE MALL FACILITY: IA MI (Circle appropriate vessel or facility.)

DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1				
2				
3				
4				
5				
6				
7				
8	5		9	
9				
10	2 gal	none	NA	BR
11	1			/ (
12				1
13				
14				
15				
16				
17	·			
18				
19				
20				
21				
22				
23				
24				
25				
26				
27				
28				
29				
30				
31				
TOTAL	A	В	С	

Total monthly solvent usage	A - (B	+ C):	7216
3 month rolling average:			

MONTH: March 2005 MACHINE I.D.#: LARGE / SMALL FACILITY: IA) MI (Circle appropriate vessel or facility.) AMOUNT OF AMOUNT OF SOLVENT AMOUNT OF SOLVENT DRAINED ADDED (lbs. / gal.) **SOLIDS REMOVED INITIALS** DAY THE 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 C TOTAL В Α

1	otal mo	onthly s	solvent	usage	A - (B	T	U).
3	month	rolling	averag	e:			

MONTH: April 2005 MACHINE I.D.#: LARGE / SMALL) FACILITY: LA/MI (Circle appropriate vessel or facility.)

DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1		4		
2		, 1		
3	0	0	0	54
4				
5		į.		
6				
7				
8				
9			т.	
10				
11				
12				
13				
14		t .		
15				
16				
17				
18				
19	,8. 1			
20				
21				
22				
23				
24				
25				9
26				
27				
28				
29				
30				
31				
TOTAL	A	В	С	

Total monthly solvent usage	A - (B + C)):	
0 11 111			

Revised: 11 March 1997

Z.53

3 month rolling average:

MONTH: May 2005 MACHINE I.D.#: LARGE / SMALL FACILITY: IA / MI (Circle appropriate vessel or facility.)

DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1	0	0	0	54
2	·			
3				
4				1
5		2	:	
6			2	
7				
8				
9				
10	7'			
11		E-MF ₂		
12				2
13				
14		3		
15	2 3			
16				
17		¥.,		
18	5 Gallons	-0	0	415
19		is .		
20				
21		•		
22				
23				
24		1		
25				
26		MOy		
27	5 gal	O		RL
28	0			
29				
30	The state of the s			
31				
TOTAL	Α ,	В	С	

Total monthly so	olvent usage A -	(B +	C):	
O 41 111				

Revised: 11 March 1997

Z.53

3 month rolling average:

Yearly total:

MONTH: June 2005 MACHINE I.D.#: LARGE / SMALL FACILITY: LA / MI (Circle appropriate vessel or facility.)

DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1	0	Full level		RK
26-17	387 - 335 = 52 worth	NA	NA	3
37-1	387 - 335 = 52 worth 300 - 274 46 total	0"	02	DT
4				
5		9	N= :	
6				
7	**			
8				
9		j.,		
10			1.	
11				1
12				× 14
13		- · ·		
14		and And		
15		\$ E	*	
16		ų	2	
17		Ť		
18			w + 22 m 4	
19				
20				
-21		s **		
22				
23				
24			ł .	
25				
26				
27				
28	A			
29				
30				
31		n.'		
TOTAL	A	В	C	

Total monthly solvent usage A -	(B	+ (C):	
2 month rolling average:				

Revised: 11 March 1997

Z.53

3 month rolling average:

Yearly total:

MONTH: July 2005 MACHINE I.D.#: LARGE / SMALL FACILITY: IA / MI (Circle appropriate vessel or facility.)

DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1	320 - 2744 464	0	0	DT
28-205	133 - Empty	NA	NA	3
3	, 3			
4				
5				
6				
7				
8				
9				
10				
11				
12				
13				9.5
14				
15				
16				
17				
18				
19				
20				,
21				
22				
23				
24				
25				
26				
27				
28				
29				
30				
31				
TOTAL	Α	В	С	

Total monthly solvent usage A - (B + C):	
--	--

MONTH: August 2005 MACHINE I.D.#: LARGE / SMALL FACILITY: IA / MI (Circle appropriate vessel or facility.)

DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1	0	٥	0	RK
2				
3				
4				
5				
6				
7				
8				
9				
10				
11				
12				
13				
14				
15		3		
16				
17				
18				
19				
20				
21				
22	35#			TS
23				
24				
25				0
26	154			BS
27				
28				
29				
30				
31				
TOTAL	A	В	С	

Total	moi	nthly	solvent	usage A	۱ - (B +	C):	
^	4.0	111						

MONTH: September 2005 MACHINE I.D.#: LARGE SMALL FACILITY: (IA / MI (Circle appropriate vessel or facility.)

acility.)				
DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1	0	0	0	PK
2		,	a *	
3				
4		1/45		
5		, A11		
6	34 165	NA	1,5	A2D
7				
8				
9	, , , , , , , , , , , , , , , , , , ,			
10				
11			i"	
12	8.	; 		
13	67 109	MA	MA	An
14				
15				gas."
16				
17				
18			•	
19				
20				
21				1
22				·
23				
24				
25				
26	13 lbs	MA	N/H	RK
27		V		
28				
29				
30				
31				
TOTAL	А	В	С	

Total monthly solvent usage A - (B +	C):	
--------------------------------------	-----	--

2005 MACHINE I.D.#: LARGE / SMALL FACILITY: IA / MI (Circle appropriate vessel or

DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1				
2				
3	0	D	0	Ra
4	,			
5				
6				
7				
8				
9				
10				
11				
12				
13				
14				
15				
16				
17				
18				
19				
20				***
21				
22				
23				
24			*	
25	10-15 Gallons	0	0	Ap
26			——————————————————————————————————————	
27			i	
28				
29				
30				
31				
TOTAL	A	В	С	

		•	
3	month	rolling	average:

MONTH: November 2005 MACHINE I.D.#: LARGE / SMALL FACILITY: IA / MI (Circle appropriate vessel or

facility.)

DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1	0	0	0	RIL
2				
3		8		
4				~
5	,			
6				
7	9#			Pete
8				
9				
10	,			
11	11 #	Ó	0 .	B
12				
13				
14				
15	l l			
16		-2		8.9
17				
18				
19				
20				
21				
22				
23				
24				
25				
26				
27				
28				
29				
30				
31				
TOTAL	A	В	С	

Total monthly	solvent	usage A -	(B +	C):	ages and a contract the universe, considerate recent left if a department on the self-money
,		0		,	

MONTH: December 2005 MACHINE I.D.#: LARGE / SMALL FACILITY: IA / MI (Circle appropriate vessel or facility.)

DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1	0	0	0	RIC
2				
3				
4				
5	22 155	0	0	KB
6				
7				
8				
9				
10	56 1bs.	0	9	VEF Z
11				
12				
13				
14				
15				
16				
17				
18				
19				
20	10 906	0	O	Dennish
21	,/			
22				
23				
24				
25				
26				
27				
28	-			
29				
30				
31				
TOTAL	A	В	С	·

Total month	y solvent usage	Α -	(B -	+ C):

MONTH: January 2006 MACHINE I.D.#: LARGE / SMALL FACILITY: IA / MI (Circle appropriate vessel or facility.)

	1. January 200	O WACHINE I.D.	.#LANGE / OIVI	ALL I AUILI	TT. IA / IVII (CITC	ie appropriate vesse	el or facility.)
Day	AMOUNT OF SOLVENT ADDED (lbs./gal)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS	SUMP TEMP ≥ 185°F & ≺210°F	PH ≻ 5.5 Doc. Actual	INIT
1							
2							
3	0	0	0	RK			
4				•			
5							
6							N 1
7							
8				7.			
9							
10	8				×* .		
11							
12	,						
13							
14							
15							
16							
17					1.		
18							
19					N		
20							
21	71#	0	0	TS			5
22							8
23							
24					2 2		
25							
26							
27							-
28							£**
29						1	
30							
31							*
TTL	A 7/	В	С				

				1	11		
31							
TTL	A 7/	В	С				
Total n	nonthly solvent u	usage A - (B + 0	C):		Rev	ised: 16 Dec 2005	Z.53
3 mont	th rolling average	e:	Yea	arly total :		_	

MONTH: February 2006 MACHINE I.D.#: LARGE / SMALL FACILITY: IA / MI (Circle appropriate vessel or facility.)

Day	AMOUNT OF SOLVENT ADDED (lbs./gal)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS	SUMP TEMP ≿ 185°F & ≺210°F	PH ≻ 5.5 Doc. Actual	INIT
1	0	\bigcirc	0	RIL			
2							
3							
4							
5							
6							
7					Marine .		
8							
9							
10							
11				a a			
12							
13							
14							
15							
16					X 1936		
17							
18							
19							
20							Na - 68
21						## ### DESCRIPTION OF THE PROPERTY OF THE PROP	
22							
23							
24							
25					(10.310-27)		
26					2.0		
27							N. N
28							
29							
30							
31							
TTL	А	В	С				

29						
30						
31						
TTL	А	В	С			
Total n	nonthly solvent ι	ısage A - (B +	C):		Revised: 16 Dec 2005	Z.53
3 mont	th rolling average	e:	Yea	arly total :		

ADVANCED HEAT TREAT CORP.

MONTHLY SOLVENT CONSUMPTION LOG MONTH: March 2006 MACHINE I.D.#: LARGE / SMALL FACILITY: IA / MI (Circle appropriate) AMOUNT OF AMOUNT OF AMOUNT OF SUMP TEMP ≥ PH > 5. 185°F & <210°F Act SOLVENT SOLVENT SOLIDS INITIALS Day

	ADDED (lbs./gal)	DRAINED	REMOVED				
1	ADDED (lbs./gal)			RU			
2	-/					,	
3					01		
4						1	
5							
6	8				and the same are the		
7					5 A 1000000		
8							
9							
10							
11							•
12							
13			a d				
14							
15							100
16							
17					2.52		
18	8						
19							
20							
21	37 165 /14	122		过る			
22							
23							
24							
25							
26	W .						
27							
28		m. page of page 1,500 and page 1,500 and					
29							
30							
31	0				KENT		野区
TTL	13,1 Xxx	В (В 1	С				

Т	ΓL	13,1 20	В	С				
Tota	al m	nonthly solvent u	usage A - (B + 0	C):		Revis	sed: 16 Dec 2005	Z.5
3 m	ont	h rolling average	e:	Yea	rly total :		8-11	é
							V	

ADVANCED HEAT TREAT CORP.

MONTHLY SOLVENT CONSUMPTION LOG

MONTH: April 2006 MACHINE I.D.#: LARGE / SMALL FACILITY: LA / MI (Circle appropriate vessel or facility.)

DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1				
2				
3	0	0	0	RU
4				
5				
6				
7				
8				
9			8	
10	16 lbs.	0	0	Au
11				
12				
13			20 20	
14				
15				
16				
17				
18	42 165	D	<i>b</i>	12
19				
20				
21				-
22				
23				
24				
25				
26				
27				
28		,		
29				
30				
31	/			
TOTAL	A 58	В	С	

Total monthly solvent usage A	۱ (ا	+	C):	
-------------------------------	-------	---	-----	--

MONTH: May 2006 MACHINE I.D.#: LARGE / SMALL FACILITY: IA / MI (Circle appropriate vessel or facility.)

Day	AMOUNT OF SOLVENT ADDED (lbs./gal)	AMOUNT OF SOLVENT	AMOUNT OF SOLIDS REMOVED	INITIALS		PH 5.5 Doc.	INIT
. 1	0	0	0	Rle			
2					2		
3							2 S2 S
4							
5							
6							
7	7 4						
8							
9							
10		8					
11							
12	- Arabono			•			
13	~						
14	1501						
15							
16							
17						X1 2 / 4 1 1 1 1 1 1 1 1 1	
18		9					
19							
20							
21							
22							
23			1		# 1999-1994 1914-1915 47 SEA14 / SE		
24	8						HARL SUIT
25							
26		2. ₃					
27		1 Eur					
28							
29	8						
30	ν.						
31							
ΠL	А	В	C				

Total monthly solvent usage A - (B + C):		Revised: 16 Dec 2005	Z.53
3 month rolling average:	Yearly total :		

MONTH: June 2006 MACHINE I.D.#: LARGE / SMALL FACILITY: IA / MI (Circle appropriate vessel or facility.)

DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1	0	0	0	RK
2				
3				
4				
5				
6				
7				
8				Jr.
9		*		a 1
10				
11				
12		κ'		
13				
14				
15				
16				
17				
18				
19				
20	10 gal.	70	70	AD
21	<i>/</i> ** -			
22				
23				
24				
25				
26				
27				
28				
29				
30				
31	9	•		
TOTAL	Α	В	С	

Total	monthly	solvent	usage A	- (B	+ C)):
				1		

Revised: 11 March 1997

MONTH: July 2006 MACHINE I.D.#: LARGE / SMALL FACILITY: _IA / MI (Circle appropriate vessel or facility.)

DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1	0	0	0	RK
2 ·				
3	10 gallons	B	0	41)
4				
5				
6	8 3			
7	*.			
8				
9				
10	i			
11	**************************************			
12	. 27			
13				
14	:	1		
15			1	-
16				
17				
18				
19	79 1/2	0	0	An
20				41
21				
22				-
23				
24				
25				
26				
27				
28				
29				
30				
31				
TOTAL	Α	В	С	

Total	monthly	solvent usage	A - (B	+ C):	

MONTH: August 2006 MACHINE I.D.#: LARGE / SMALL FACILITY: IA / MI (Circle appropriate vessel or facility.)

471

DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1	0	0	0	Re
2	39#		9	
3	39#	0	0	TV
4				
5				
6				
7	2	r.		
8			8 .	
9				
10			, in	
11		• 1	1	
12				
13				
14				
15		19 12,		n Štán 19
16	60 c	0	0	ALL
17		2		
18				
19				×
20		9		
21		' c'y		
22		9		
23	77° ,		8	
24	i i			
25				
26		,		
27	50 [±]	D	0	12
28				
29			100	
30			090	
31				
TOTAL	A	В	С	

Total	mor	ithly	solvent	usage	Α-	(B	+	C):	

MONTH: September 2006 MACHINE I.D.#: LARGE / SMALL FACILITY: IA / MI (Circle appropriate vessel or

facility.)

DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1	0	0	0	PW
2		× ×	**	
3				
4	. 1			
5	36 mm			75
6				
7				
8				
9				
10				
11				
12	236 685	20 992	5 LBS (TOUS TEAMED	mar
13			(CLEANED	
14				
15				
16				
17				
18				
19				
20				
21	24/65	0	<i>b</i>	12
22				
23				
24				-
25				~
26	0			
27		,		
28				
29		,		
30				
31				
TOTAL	А	В	С	77

Total	monthly	solvent	usage /	4 - (B	+ (;):	
0	-41 Ill-						

MONTH: October 2006 MACHINE I.D.#: LARGE/SMALL FACILITY: IA/MI (Circle appropriate vessel or

AMOUNT OF SOLVENT AMOUNT OF AMOUNT OF DAY ADDED (lbs. / gal.) SOLVENT DRAINED SOLIDS REMOVED **INITIALS** 54# N M TOTAL C

Total monthly solvent usage A - (B + C): _

Revised: 11 March 1997

Z.53

3 month rolling average:

MONTH: November 2006 MACHINE I.D.#: LARGE / SMALL FACILITY IA MI (Circle appropriate vessel or facility.)

DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1				
2 🗸	4/#	1A	1 de	75
3				
4			1 () () () () () () () () () (
5				
6				
7				
8			1	2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2
9	and the second s			
10				
11				
12				
13,				
14	27 [±]	N	14	05/23
15				
16				
17.				
18				<u> </u>
19				kur d
20	2/#			-
21	40340	145 LBS	NA	72
22	23/65	173 203	N.A.	pm
23				
24 25		The state of the s		
26				
27		The state of the		
28		water to an annual such a pale and the course, is an about the transfer of the course an annual representative and the course		
29				
30	and the second s			
31				
TOTAL	A	.в	C S	

Total monthly solvent usage A - (B + C): 3 month rolling average: Yearly total:

Revised: 11 March 1997

MONTH: <u>December 2006</u> MACHINE I.D.#: <u>LARGE / SMALL</u> FACILITY: <u>IA / MI</u> (Circle appropriate vessel or facility.)

DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1				
2	86 H	0	0	RN
3		9		
4				
5				*
6	,		6	
7				~
8				
9				
10			9	
11	9			
12				
13		8	9,	
14				
15				
16				
17		¥		
18		:		74
19	4//65	$\widehat{\mathcal{O}}$	0	12
20				
21				
22				
23				
24				
25				
26	484		,	VZ
27				
28				
29		3		
30				
31				
TOTAL	A	В	С	

Total	mo	nthly	solvent	usage	Α-	(B	+ C)):
~								

MONTH: January 2007 MACHINE I.D.#: LARGE SMALL FACILITY: IA) MI (Circle appropriate vessel or

facility.)

DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1			e .	
2	Θ	0	0	Re
3				
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19		1000	1 .	
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21				
22		s		
23				
24	48#	O	0	AD
25				
26				
27				
28				
29				
30				
31				
TOTAL	Acc	В	С	

Total monthly solvent usage A - (B + C): 392 165 3 month rolling average:

Revised: 11 March 1997

MONTH: February 2007 MACHINE I.D.#: LARGE (SMALD) FACILITY: (IA) MI (Circle appropriate vessel or facility.)

DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1 /	33 [#]	. 8		5P /k
2	7 0,000	i i	4	-1 (/
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12 /	22			DS
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21	4			
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	8		1	•
26	20th	Noue	Nove	12
27				
28	2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2			
29				
30		5.		
31				
TOTAL	A	В	С	

Total Honting S	OIVEII	Lus
3 month rolling	avera	ge
Yearly total:		

 ${\tt MONTH:} \underline{March\ 2007} \ \ {\tt MACHINE\ I.D.\#:} \ \underline{{\tt LARGE\ /\ SMALL}} \ \ {\tt FACILITY:} \ \underline{{\tt IA\ /\ MI}} \ \ ({\tt Circle\ appropriate\ vessel\ or\ facility.})$

DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1	()	0		the
2	5-3			DI
3				
4				
5			1	
6	47		*.	28
7				123
8		3		
9				
10				
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23			·	
24				
 25		9-3-3-	\$	
 26				
27				
 28	·			
 29	4/3 #			75/00
 30				10/01
31		* '4,		-
ΓΟΤΑL	A	В	C	

	otal Ille	niciny c	JOIVCIIL	uJ
3	month	rolling	avera	ae:

Yearly total:

MONTH: April 2007 MACHINE I.D.#: LARGE / SMALL FACILITY: IA / MI (Circle appropriate vessel or facility.)

DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1	.1 1		,	
2	42	0	7)	2D
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4		,	v	N.
5			2	1.24
6			3	
.7	1			
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21	14	Ö	O	82
22	. 174%		Y Y	
23				
24		, ,		
25			L.	
26	324 165	188 165 2136	0	BL BOA
27		₩		\$10.
28	i.			
29				<u> </u>
30				
31				
TOTAL	A	B	C	

Total monthly solvent usage A - (B + C): ______

Revised: 11 March 1997

Z.53

3 month rolling average:

Yearly total:

MONTH: May 2007 MACHINE I.D.#: LARGE / SMALL FACILITY: IA / MI (Circle appropriate vessel or facility.) **AMOUNT OF** AMOUNT OF **AMOUNT OF** SUMP TEMP | PH | 5.5 Doc. SOLVENT SOLVENT SOLIDS **INITIALS** INIT Day 185°F & □210°F Actual DRAINED REMOVED ADDED (lbs./gal) Pll

	30							
	31	33	0		05			
-	TTL	А	В	C	. 44			
T	otal n	nonthly solvent u	ısage A - (B + 0	C):	A 12A12.	Revised	: 16 Dec 2005	Z.53
3	mont	h rolling average	9:	Yea	rly total :		er .	

MONTH: June 2007 MACHINE I.D.#: LARGE / SMALL FACILITY: IA / MI (Circle appropriate vessel or facility.)

DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1.		\bigcirc	6	Ru
2				
3			7.5	
4			A	
5				
6			7.	
7				LJZ
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11			1.	*
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18		9	,	
19	22	0	, 7	R
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22	43	0		HP/DS
23	s 7		× .	
24	3			
25		7		
26	*			
27				
28				
29				
30 .	7°, 1°, 1°			
31	3			r ² ,
TOTAL	Α	В	С	n :

Total monthly solvent usage A - (B + C):	!
--	---

Revised: 11 March 1997

Z.53

3 month rolling average: Yearly total:

MONTH: July 2007 MACHINE I.D.#: LARGE / MALL FACILITY: (Circle appropriate vessel or facility.) AMOUNT OF SOLVENT **AMOUNT OF AMOUNT OF** DAY ADDED (lbs. / gal.) SOLVENT DRAINED **SOLIDS REMOVED** INITIALS 2 6 9 10 11 12 13 14 15 16 17 18 20 21 22 24 25 26 27 28 32 29 30 31 C TOTAL Α В

Total monthly solvent usage A - (B +	C):	7)#	
3 month rolling average:			

3 month rolling average: Yearly total:

Revised: 11 March 1997

BR 8-1-07

MONTH: August 2007 MACHINE I.D.#: LARGE (SMALL) FACILITY (IALMI (Circle appropriate vessel or facility) AMOUNT OF AMOUNT OF AMOUNT OF SOLVENT INITIALS: ADDED (lbs. / gal.) SOLIDS REMOVED SOLVENT DRAINED DAY 17 B · Si Park C TOTAL

Total monthly solvent usage A - (B + C): 3 month rolling average:

Revised: 11 March 1997

Yearly total:

MONTH: September 2007 MACHINE I.D.#: LARGE / SMALL FACILITY: IA/MI (Circle appropriate vessel or

facility.)				T T
DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	I SOLVENI DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1	143	. Ø	O	TV
2	34 165	6 4	0	DA
3				
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11	25/bs	154.	0	12
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15				Ç.,
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17				v
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21		New Year	37°	
22				~ ~ .
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25			4. T	
26	₹			ev.
27	14/2		ν.	
28	\$	<i>₩</i> •		
29			(8)	4,
30	30			
31				
TOTAL	Α	В	Ć	0.4

Total monthly solvent usage A - (B + C): 3 month rolling average: Yearly total:

MONTH: October 2007 MACHINE I.D.#: LARGE / SMALL FACILITY: IA / MI (Circle appropriate vessel or facility.)

facility.)				
DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1	$\hat{}$		0	RK
2				
3	9.3			* :
4	1.4s			
5				
6	30/65	D	. 0	12
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13		3	A second	
14		7		
15				
16	33/45		0	D)-
17				
18		7		
19	, Y			***
20				
21		. A.		
22		%."		
23				
24	20 165	0	O	RW
25				1
26		-		
27				
28				
29				
30				
31	23 lbs added	0	0	DH
TOTAL	A	В	С	F-3-11

Total monthly solvent usage A - (B + C): ___ 3 month rolling average:

MONTH: November 2007 MACHINE I.D.#: LARGE SMALL FACILITY: IALMI (Circle appropriate vessel or

facility.)				
DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1		\mathcal{C}		Rec
2				/
3				
4				
5	22165	D	D	12
6				
7 .	as lbs	0	. O .	ZW.
8				
9		w.		
10		r		
11				9
12				
13	1 2			
14				
15			* 2	
16				
17		-		
18				
19	3/#	N	N	95
20				
21			1	
22				
23				
24				
25				
26	,			
27				
28				
29				
30				
31				
TOTAL	A	В	С	

3 month rolling average Yearly total:



MONTH: Machine I.D.#: LARGE / 8MALU FACILITY IA MI (Circle appropriate vessel or facility.)

DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1	(100 gan)			201
2		- /: · · · · · · · · · · · · · · · · ·		<u>ec</u>
3	*			
4		The state of the s		
5			V 7	
6		*		
7	3	***************************************		
8				
9	35 #	2.3		73
10			7 % %	
11			3	
12				
13	263 LBS	189 LBS	Of Drain+Clear	2 N N-
14	200	101 500	trill	DA
15				
16				
17				
18				
19			:	
20				****************
21		9		
22			1.4.	
23		A.	Series Control	
24	>		700 sk	**************************************
25	*	*.		Contractor Street, and a second
26		· \		
27	7	[†] a		
28		W. S.		
29	at .			
30		\$. 0 		
31			12	
TOTAL	-A .	В	С	

Total monthly solvent usage A - (B + C): _ 3 month rolling average:

1060

Revised: 11 March 1997

Z.53

Yearly total:

AHIC ReInformation

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and Spill Reporting

Telephone Number: (800) 943-0003

STATE OF WISCONSIN Chapter 291, Wis. Stats. Form 4400-66P

Rev. 1-99

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State of Wisconsin Department of Natural Resources Bureau of Waste Management Box 8094

Copies 1 & 3 mail to Wis. DNR at above address.

Madison, WI 53708

FOR DNR USE ONLY

A	UNIFORM HAZARDOUS	1. Generator's	US EPA ID No.	Manifest	2. Page	THIOTHE	tion in	the shad	ed areas
	WASTE MANIFEST	IAD056		Document No.		The second secon	THE PERSON NAMED IN	by Fede	-
	3. Generator's Name and Mailing Address ADVANCE HEAT TREAT CORP 2839 BURTON AVE. WACEEPator Phone (507)03		Site Location If	Different	Name and Address of the Owner, where	te Manifest I I K 09 te Generator	NAME AND ADDRESS OF THE OWNER, WHEN	6 Numb	er
1	5. Transporter 1 Company Name 232-5	525T	6. US EPA ID N	Number -	C. Stat	e Transporte	r's ID		0096
	7. Transporter 2 Company Name		8. USEPAID		With the second	nsporter's Ph te Transporte		3192	32 9 73:
	9. Designated Facility Name and Site Address	S	NEGODOO 10: US EPA ID Y			nsporter's Ph te Facility's		0-22() -155 5
	WRR ENVIRONMENTAL SERVICE 5200 STATE RD, 93 EAU CLAIRE, WI 54701	ES	WID99082			ility's Phone	71,58	33496	24
	11. US DOT Description (Including Proper Shi	pping Name, Haz	zard Class, and ID N	No.	Type	13. Total Quantity	Unit Wt/Vol	Waste	I. No.
G	a. RQ,WASTE TRICHLOROETHYLENE,6.1,1	UN1710,PGIII,(F	001)	001	Denc	10075E	6	F00	
GENERATOR	b.	* N - 2				Napor.		Arman,	- Alexandr
A	c.					1 1 1 1	-		
R	d.								
	J. Additional Descriptions for Materials Listed	Above			K. Hai	ndling Codes	for Was	tes Liste	d Above
-	a) D022 D039 D040								
	15. Special Handling Instructions and Addition	nal Information	, p		, 4 4	9	×		
	a) 113405WLA-188709			A. P. C.					
	Emergency Phone Number: 16. GENERATOR'S CERTIFICATION: I her shipping name and are classified, packed, m plicable international and national governs sources. If I am a large quantity generator, degree I have determined to be economicall available to me which minimizes the preser OR, if I am a small quantity generator, I h select the best waste management method	eby declare that tarked, and labeled mental regulation I also certify that ly practicable and at and future thre	the contents of this of and are in all respense and according to I have a program in I have selected the eat to human health faith effort to minimal to the content of the	cts in proper condi- the requirements place to reduce the practicable metho and the environments mize my waste gen	tion for to of the W volume a od of treat ent;	ansport by hisconsin Dep ind toxicity of tment, storag	ighway a artment waste a	according of Natu generated posal cu	g to ap- ral Re- l to the
-	Printed/Typed Name & Position Title	Managel	Signature X	A Chasel	<u>10</u>		Month	Date Day	Year
T	17 TRANSPORTER 1 Acknowledgement of R	leceipt of Materia				7	3 3	Date	The state of the s
AN	Printed/Typed Name & Position Title	11/42 150	Signature	The state of		1		Day	Year
SPO	18. TRANSPORTER 2 Acknowledgement of R	Driver		ma (D		meen.	B (S) ==	Date	K 8
TRANSPORTER	Printed/Typed Name & Position Title	eccipt of Materia	Signature				Month	THE REAL PROPERTY AND ADDRESS OF	Year
	19. Discrepancy Indication Space					***************************************			
F A C		1 2		8 X				8 4	
A C I L I	20. FACILITY OWNER OR OPERATOR: Cer noted in Item 19.	rtification of recei	ipt of hazardous ma	terials covered by	this man	ifest except a	s	Date	
Y	Printed/Typed Name & Position Title		Signature				Month	Day	Year
	PA Form 8700-22 (Rev. 9-88) Previous editions are nergency 24 Hour Assistance	e obsolete.	Copy Distribution:	 1 — Generator se 2 — Generator re 3 — Facility send 	tain	5	- Facili	ty retain ty send to porter ret	Generator ain

COPY 2-

GENERATOR RETAIN

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STATE OF WISCONSIN Chapter 291, Wis. Stats.

Form 4400-66P

Rev. 1-99

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State of Wisconsin Department of Natural Resources Bureau of Waste Management Box 8094 Madison, WI 53708

FOR DNR USE ONLY

For	rm designed for use on elite (12-pitch) typewriter.				Form Appro	oved. OMB No. 2050-0039
1	UNIFORM HAZARDOUS WASTE MANIFEST	 Generator's US EPA ID No. TAD056504186 	Manifest Document No.	2. Page	1 Inform	nation in the shaded areas required by Federal law.
	3. Generator's Name and Mailing Address ADVANCED HEAT TREAT CORP 2839 BURTON AVE., WATERLOO, IA 4. Generator's Phone (319-232-5221)	Site Location If D	ifferent	W.	te Manifest I K 18: te Generator	
	5. Transporter 1 Company Name HYDRITE CHEMICAL - WL	6. US EPA ID Nu IAT200010	593	D. Trai	nsporter's P	er's ID UPW100011MN thone 319-232-9731
	7. Transporter 2 Company Name TRANSWOOD 9. Designated Facility Name and Site Address	8. US EPA ID Nu NEOCOOSO 10. US EPA ID Nu	580	F. Tran	te Transport nsporter's P te Facility's	per's ID UPW05407770B hone 800-220-1555
	WRR ENVIRONMENTAL SERVICES 5200 STATE RD. 93 EAU CLAIRE, WI 54701	WID990829			ility's Phone	
	11. US DOT Description (Including Proper Ship		mber) 12. Conta	Type	Total Quantity	Unit I. Wt/Vol Waste No.
GEN	a. RQ, WASTE TRICHLOROETHYLENE, 6.	.1,UN1/10,PGIII,(FOO1)	991	Om C	2005	6 F001
GENERAT	c.					
T O R	d.					
A SECURITY SECURITY OF SECURITY	J. Additional Descriptions for Materials Listed a) DO22 DO39 DO40	Above		K. Han	dling Codes	for Wastes Listed Above
	 15. Special Handling Instructions and Addition a) 113405WLA142252 EMERGENCY PHONE NUMBER: 319-2 16. GENERATOR'S CERTIFICATION: I here shipping name and are classified, packed, ma plicable international and national government of the process of the process of the process of the present available to me which minimizes the present at the present of the present of	232-5221 by declare that the contents of this contents and labeled, and are in all respect tental regulations and according to the also certify that I have a program in all	s in proper condit	ion for tra	ansport by h sconsin Dep	ighway according to ap- artment of Natural Re-
	OR, if I am a small quantity generator, I has select the best waste management method t	that is available to me and that I can a	ze my waste gene afford.	eration ar	nd	Date
T	Printed Typed Name & Position Title North	MACHE Y JIM	eld Les	ue		Month Day Year 03052002
RANSPORTER	Printed/Typed Name & Position Title X James C Backman 18. TRANSPORTER 2 Acknowledgement of Re Printed/Typed Name & Position Title	Driver X Jame	o C Bo	eck	nan	Month Day Year O3053000 Date Month Day Year
FAC	19. Discrepancy Indication Space			,		
I L I	20. FACILITY OWNER OR OPERATOR: Certinoted in Item 19.	ification of receipt of hazardous mater	ials covered by th	nis manif	est except a	Date
Y	Printed/Typed Name & Position Title A Form 8700-22 (Rev. 9-88) Previous editions are	obsolete. Copy Distribution:		to Wis T		Month Day Year

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Telephone Number: (800) 943-0003

2 - Generator retain

3 - Facility send to Wis. DNR Copies 1 & 3 mail to Wis. DNR at above address. - Facility retain

5 - Facility send to Generator

6 - Transporter retain

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FOR	DNR	USE	ONLY

WASTE MANIFEST		EPA ID No.	Docum	nifest ent No.	2. Pag of	11110	rmation i ot requir		
3. Generator's Name and Mailing Address	ERENOUGH .	Site Location If	f Different			ate Manife			iber
DVANCED HEAT TREAT CORP				* 10	M	IK A	370	<u>60</u>	
839 BURTON AVE., WATERLOO, IA 4. Generator's Phone 312 332 5221 5. Transporter 1 Company Name	50703				B. St	ate Genera	tor's ID		
5. Transporter 1 Company Name		6. US EPA ID I	Number			ate Transp		Intro	VA 4 4 3 4
THE TARTE CANDINGS IN THE		TAMMONDA	200			ansporter's		19-232	$\frac{1-072}{1}$
7. Transporter 2 Company Name	6 .	8. US EPA ID	Number	W 50	F. Tr	ate Transp ansporter's	Phone	JPW05	107770
9. Designated Facility Name and Site Addre	ess	10. US EPA ID	Number	*	G. St	ate Facility	's ID 🤴	00-220)-135:
WRR ENVIRONMENTAL SERVICES 5200 STATE RD. 93 BAU CLAIRE, WI 54701		WID990829	9475		H. F	cility's Ph	_	15-83-	GA9-
1. US DOT Description (Including Proper Si	hipping Name, Hazar	d Class, and ID I	Number)	12. Conta	Type	13. Total Quantit	Uni Wt/V	t	I. te No.
RQ, WASTE TRICHLOROETHYLENE, 6	.1,UN1710,PGI	II,(F001)	7.	002	DM	0011	DG	F001	
•	¥ 5					Co. ICK. ISS. IS			BROKE
							+		
				- F T		-111	,		1
. Additional Descriptions for Materials Liste	od Above	Art of three participations of the control			кн	andling Co	les for W	astes Li	sted Ah
Additional Descriptions for Materials Liste	a Apove				300000000	amaning co.	400 104 11	COVOD LAK	JUUG 111
5. Special Handling Instructions and Additi a) 113405WLA166394	222-5221								
5. Special Handling Instructions and Additi a) 113405WLA168394 ***THERESHOT FHONE NUMBER: 319- 6. GENERATOR'S CERTIFICATION: I he shipping name and are classified, packed, plicable international and national gover sources. If I am a large quantity generator degree I have determined to be economic available to me which minimizes the pres	232–5221 ereby declare that the marked, and labeled, a nmental regulations ar, I also certify that I lally practicable and I ent and future threat	and are in all respondent according to have a program in have selected the to human health	ects in proportion the required place to reduce practicable and the er	er condit ements of duce the le metho nvironme	of the V volume d of tre ent;	transport by Visconsin I and toxicit atment, sto	described y highwa Departme	y accord nt of Na e genera	ing to a tural R ted to tl
6. GENERATOR'S CERTIFICATION: I he shipping name and are classified, packed, plicable international and national gover sources. If I am a large quantity generator degree I have determined to be economic.	ereby declare that the marked, and labeled, a numerial regulations and I ally practicable and I ent and future threat	and are in all responded and according to have a program in have selected the to human health with effort to mini	ects in proportion the required place to reduce to reduce practicable and the entire imize my w	er condit ements of duce the le metho nvironme	of the V volume d of tre ent;	transport by Visconsin I and toxicit atment, sto	described y highwa Departme	y accord nt of Na e genera disposal	ing to a tural R ted to th current
5. Special Handling Instructions and Additional 113405WLA168394 ***********************************	ereby declare that the marked, and labeled, a mental regulations at, I also certify that I lent and future threat have made a good fad that is available to	and are in all respend according to have a program in have selected the to human health with effort to minime and that I call signatured.	ects in proportion the required place to reduce to reduce practicable and the entire imize my w	er condition of the con	of the V volume d of tre ent;	transport by Visconsin I and toxicit atment, sto	described y highwa Departme	y accord nt of Na e genera disposal	ing to a tural R ted to the current
5. Special Handling Instructions and Additional 113405WLA168394 ***TERCENCY PHONE NUMBER: 319-6. GENERATOR'S CERTIFICATION: I he shipping name and are classified, packed, plicable international and national gover sources. If I am a large quantity generator degree I have determined to be economic available to me which minimizes the preson, if I am a small quantity generator, I select the best waste management method printed/Typed Name & Position Title 17. TRANSPORTER 1 Acknowledgement of Printed/Typed-Name & Position Title	ereby declare that the marked, and labeled, a mental regulations at, I also certify that I lent and future threat have made a good fad that is available to	and are in all respend according to have a program in have selected the to human health with effort to minime and that I call signatured.	ects in prop o the requir- n place to re- e practicable h and the er imize my wan afford.	er conditements of duce the le methon vironme	of the V volume d of tre ent;	transport by Visconsin I and toxicit atment, sto	described by highway Department by of wast orage, or	Dat	tural R ted to the current
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GENERATOR RETAIN

STATE UP WISCONSIN Chapter 291, Wis. Stats. Form 4400-66P

Rev. 1-99

ALL COPIES MUST BE LEGIBLE,

State of Wisconsin Department of Natural Resources Bureau of Waste Management Box 8094 Madison, WI 53708

FOR DNR USE ONLY

PLEASE TYPE

Form designed for use on elits (12-pitch) typewriter.		Fan	n Approved. ON	IB No. 2050-0039.
UNIFURIA HAZARDOUS	1. Generator's US EPA ID No.	Manifest 2	D : 1	rmation in the shaded areas
WASTE MANIFEST 3. Generator's Name and Mailing Address	IAD056504186	1073131		ot required by Federal law.
ADVANCED HEAT TREAT CORP	Site Location If D	different	State Manif	
2839 BURTON AVE., WATERLOO, IA	50703	Transfer of the contract of th	R State Coner	
4. Generator's Phone 819-232-5221				
5. Transporter 1 Company Name	6. US EPA ID No	mber	State Transpo	National Line
HYDRITE CHEMICAL - WL	IAT2000105	593	de Transporter a	Phone 319-232-9731
7. Transporter 2 Company Name	8. US EPA ID Nu	imber	State Transpo	DUPWOS407770E
9. Designated Facility Name and Site Address	10. US EPA ID No	THE RESIDENCE OF THE PERSON NAMED IN COLUMN TWO IS NOT THE OWNER, THE PERSON NAMED IN COLUMN TWO IS NOT THE OWNER, THE PERSON NAMED IN COLUMN TWO IS NOT THE OWNER, THE PERSON NAMED IN COLUMN TWO IS NOT THE OWNER, THE PERSON NAMED IN COLUMN TWO IS NOT THE OWNER, THE PERSON NAMED IN COLUMN TWO IS NOT THE OWNER, THE PERSON NAMED IN COLUMN TWO IS NOT THE OWNER, THE PERSON NAMED IN COLUMN TWO IS NOT THE OWNER, THE PERSON NAMED IN COLUMN TWO IS NOT THE OWNER, THE PERSON NAMED IN COLUMN TWO IS NOT THE OWNER, THE PERSON NAMED IN COLUMN TWO IS NOT THE OWNER, THE PERSON NAMED IN COLUMN TWO IS NOT THE OWNER,	Transporter's	Phone-800-220-1555
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EAU CLAIRE, WI 54701				715-834-9624
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available to me which minimizes the present a	nd future threat to human health an	d the environment	c merment's col	age, or disposal currently
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19. Discrepancy Indication Space			to the control of Manager Money	
20. FACILITY OWNER OR OPERATOR: Certific noted in Item 19.	ation of receipt of hazardous mater	ials covered by thi	s manifest excep	t as
Printed/Typed Name & Position Title	Signature			Month Day Year
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A Form 8700-22 (Rev. 9-88) Previous editions are obs		1 - Generator send t		4 — Facility retain
Emergency 24 Hour Assistance and Spill Reporting		 Generator retain Facility send to 	Wis: DNR	5 — Facility send to Generator 6 — Transporter retain
Telephone Number (800) 943-0003 FACILITY SE		mail to Wis. DNR at	above address.	Tampa ta racin

Plea		nt or type. (Form design	ned for use off ell	te (12-pitch) typewhie	:1.)	To David (1)	F	- Di	4. Manifest		n Approved.	OIVID NO.	2050-0039
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	14. Sp	pecial Handling Instruction	ns and Additional Info	ormation				<u> </u>		J			
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DESIGNATED FACILITY	19. Ha	azardous Waste Report M	anagement Method	Codes (i.e., codes for ha	azardous waste tre	atment, disposal,	and recycling systems))	4.				
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		esignated Facility Owner of	or Operator: Certifica	ation of receipt of hazard	ous materials cove	ered by the manife		em 18a			Ma	nth Dov	Voor
1	- mile	our typeu traille				Signa	iture				Mo	nth Day	Year
EP	A Form	1 8700-22 (Rev. 3-05)	Previous editions	are obsolete.						G	ENERATO	R'S INIT	AL COPY

AHTC Information Request 3

Inspector: Inspector: Signature 1. Is there hazardous waste in storage? (Les) or No? Circle. If "no", stop here. 2. Is drum labeled hazardous waste and accumulation start dated? Yes or No? 3. Is drum leaking or damaged? Yes or No? 4. Is drum in storage less than 180 days? (Les) or No? Drums must be shipped by 180 days from accumulation start date. 6. Is drum on a containment pallet to catch any leaks or spillage? (Les) or No? 7. Is spill clean up or absorbent material nearby? (Les) or No? 8. Start 1/1/ date (13.30)? Founds 2354 Inspector: Private Signature 1. Is there hazardous waste in storage? (Les) or No? Circle. If "no", stop here. 2. Is drum labeled hazardous waste and accumulation start dated? Yes or No? 3. Is drum labeled hazardous waste and accumulation start dated? Yes or No? 4. Is drum tightly closed? (Les or No? 5. Is drum in storage less than 180 days? (Les) or No? Drums must be shipped by 180 days from accumulation start date. 6. Is drum on a containment pallet to catch any leaks or spillage? (Les) or No? 7. Is spill clean up or absorbent material nearby? (Les) or No? 8. Start Fill Late (12.13-07) funds 3354 fany of the answers to the above were "no", explain corrective actions taken by whom and when	Weekly Hazardous Waste Storage Inspection Checklist
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AHIC Information Request 4

ADVANCED HEAT TREAT, CORP.

Emergency Action Plan

(Employee Emergency Plans) 1910.38(a)

In order to establish and maintain a working environment where all employees are aware of designated actions employers and employees must take to ensure employee safety from fire and other emergencies, Advanced Heat Treat Corp. has established and will maintain the following Emergency Action Plan. This plan will meet or exceed Iowa Occupational Safety and Health Standards for General Industry 1910.38(a). All employees are responsible for their cooperation with this Emergency Action Plan.

(a)(1)

This plan applies to all emergency action plans required by a particular Occupational Safety and Health Act (OSHA) standard. Advanced Heat Treat Corp. has established and will maintain a written Employee Emergency Action Plan. This plan shall cover those designated actions employers and employees must take to ensure employee safety from fire and other emergencies.

(a)(2)(i)

When a fire alarm is activated or an emergency weather announcement is made (PA System), all Advanced Heat Treat employees shall immediately turn off the equipment they are working on and proceed to the appropriate meeting area. The drawings at the end of this plan detail the exit routes to be followed and/or designated meeting places. An evacuation map is also located on the company bulletin board near the break room.

(a)(2)(ii)

There are NO critical plant operations that will require employees to remain behind to operate. All employees will evacuate the buildings or meet at designated areas.

(a)(2)(iii)

In an emergency situation all employees are to safely evacuate the buildings and immediately meet at the designated meeting place as marked on the Emergency Action Plan drawing, the SE (back) parking lot. If the emergency is weather related the employee will meet inside at the designated area (interior office restrooms). The on-duty Operations Manager, Assistant Operations Manager, Shift Supervisor, or Lead Person will be responsible for taking roll of all employees to determine their presence. Roll should be based on a current and correct knowledge of working employees.

(a)(2)(iv)

Waterloo Fire Department personnel will perform all rescue and medical duties at Advanced Heat Treat Corp..

(a)(2)(v)

All fire and other emergencies should be reported to the 911 Emergency Center. Emergency services outside of Advanced Heat Treat Corp. will be contacted by dialing the 911 Emergency Center telephone number. (Dial 9-9-1-1) Only those employees properly trained and authorized by Advanced Heat Treat Corp. to use portable extinguishers shall attempt to control an incipient state fire with portable extinguishers.

Revision2/22/2005

ADVANCED HEAT TREAT, CORP.

(a)(2)(vi)

For further information or explanation of duties under this plan, contact the Human Resources Manager, Assistant Operations Manager, or President.

(a)(3)(i)

Midport facility will utilize the fire alarm system and PA system for announcement of weather related emergencies.

(a)(3)(ii)

Communication of emergency situation will be by activating the fire alarm system or an announcement of a weather emergency. The Human Resources Manager, Operations Manager, Assistant Operations Manager, Shift Supervisor, Lead Person, or Lab Technician will be responsible for making the weather announcement.

(a)(4)

The Advanced Heat Treat Corp. alarm will instruct employees to go to the designated storm emergency area or to evacuate the building. Any emergency that creates an unsafe condition within the plant should follow fire emergency procedures. Any emergency that creates unsafe conditions outside the plant will follow storm emergency procedures.

(a)(5)(i)

The Human Resources Manager, Operations Manager, Assistant Operations Manager, Shift Supervisor and Lead Person will be responsible for the safe and orderly emergency evacuation of all office and plant employees respectfully.

(a)(5)(ii)

The Emergency Action Plan shall be reviewed with all employees when the plan is initially developed, whenever the employee's responsibility or a designated action under the plan changes, and whenever the plan is changed.

(a)(5)(iii)

Upon initial assignment, each employee shall receive a review of the parts of the Emergency Action Plan, which each employee must know to protect the employee in the event of an emergency.

A copy of the Advanced Heat Treat Corp. Emergency Action Plan is located in the Safety Programs Notebooks located in the main office and on the Run Desk.

Advanced Heat Treat Corp. requires and encourages participation by all employees with this plan. Any questions, comments, or suggestions, concerning this plan, should be brought to the attention of Human Resources Manager, Assistant Operations Manager, or Safety Coordinator.

FIRE PREVENTION PLAN (Employee Fire Prevention Plans) 1910.38(b)

In order to establish and maintain a working environment where all employees are protected from fire hazards, Advanced Heat Treat, Corp. has established and will maintain the following Fire Prevention Plan. This plan will meet or exceed Iowa Occupational Safety and Health Standards for General Industry 1910.38(b).

All employees are responsible for their cooperation with this Fire Prevention Plan.

(b)(1)

This plan applies to all fire prevention plans required by a particular Occupational Safety and Health Act (OSHA) standard. Advanced Heat Treat, Corp. has established and will maintain a written Fire Prevention Plan.

(b)(2)(i)

Advanced Heat Treat, Corp. has identified and listed the major workplace fire hazards:

- a) Class A fire hazards are located at the railroad ties and wooden pallets outside the west end of the building.
- b) Class B fire hazards exist in the container of gas for the lawn mower at the west end of the building, the kerosene for the power washer at the power washer location, the pump oil storage center of the north wall, the 1,1,1 Trichloroethane for use in the vapor degreasers, the alcohol in the lab, the oxygen and acetylene welding/cutting gases used throughout the plant, and the nitrogen, hydrogen, methane, and oxygen gasses used in the vacuum chambers throughout the plant and stored outside the northwest corner of the building and in the center of the north wall.
- c) Class C fire hazards exist in power supply units throughout the plant.
- d) Class D fire hazards exist in the machining titanium for lab samples.

All materials and equipment creating a fire hazard will be properly handled and stored:

- a) Materials and equipment creating a Class A fire hazards shall be kept clear of potential ignition sources.
- b) Materials creating a Class B fire hazards shall be kept clear of potential ignition sources unless required for proper use of materials. Materials will be stored in properly labeled, closed containers. Only approved containers and portable tanks shall be used. When dispensing Class I liquids, the nozzle and container shall be electrically interconnected.
- c) Materials and equipment creating a Class C fire hazard will be properly maintained. All employees shall properly use electrical equipment.

All potential ignition sources will be controlled by elimination or containment in order to prevent contact with workplace fire hazards. Potential ignition sources have been identified as all power supplies throughout the plant. These include; smoking and matches or lighters throughout the plant, Arc welding where needed, oxy acetylene cutting torch where needed, static electricity, and process arcing inside chambers. Signs will be posted where necessary to remind and instruct employees to eliminate potential ignition sources in areas containing materials that are potential fire hazards.

Revised: 6-11-01 5

Advanced Heat Treat, Corp. has two available sources of fire protection equipment. The Waterloo Fire Department is located approximately two miles from Advanced Heat Treat Corp. The fire department is available as needed and is equipped to handle all classes of fires. The second available source of fire protection equipment is the inhouse system of portable extinguishers for Class A, B, and C fires. All employees should be aware of the location and class of fire extinguishers in their immediate working area. Only those employees properly trained and authorized to use portable extinguishers shall attempt to control an incipient state fire with portable extinguishers.

(b)(5)

Advanced Heat Treat, Corp., authorized personnel shall regularly and properly maintain, according to established procedures, equipment and systems installed on heat producing equipment to prevent accidental ignition of combustible materials. Heat producing equipment includes but is not limited to furnaces above the offices and laboratory, two electrical water heaters, and the air heater hanging in the plant area. Maintenance procedures include the maintenance of safety devices which shut off fuel flow or energy when equipment is over-temperature or if a fire hazard condition is established. Maintenance procedures will include checking connections, check for correct operation of moving parts, and check equipment for any deterioration. Any maintenance required will be performed by competent persons with correct replacement parts.

(b)(2)(i)

Advanced Heat Treat, Corp. personnel responsible for maintenance of fire equipment and systems installed to prevent or control ignitions or fires is the Operations Manager.

(b)(2)(iii)

Advanced Heat Treat, Corp., personnel responsible for control of fuel source hazards is the Operations Manager.

(b)(3)

Advanced Heat Treat, Corp. has in place, and will maintain, housekeeping procedures that shall control accumulations of flammable and combustible waste materials and residues so that they do not contribute to a fire emergency. At the end of each working shift, time for individual clean-up is provided. Each employee will be responsible to remove all flammable and combustible waste materials and residues from his work area, surrounding area and/or specific assigned area. All waste materials will be properly disposed of in correctly identified and designed receptacles by the employee.

These waste receptacles will be emptied on an as-needed basis by assigned personnel who will empty contents into properly identified and designed containers so that waste materials can be safely and properly destroyed or removed from premises by authorized personnei. Clean-up shall be assigned and properly completed as often as necessary to eliminate conditions that could contribute to a fire emergency.

(b)(4)(i)

Advanced Heat Treat, Corp. will apprise employees of the fire hazards of the materials and processes to which they are exposed. This will be accomplished by the Hazardous Materials (Right-to-Know) training as well as Employee Fire Prevention Plan Training. Properties of materials, pertaining to fire hazards, are identified for every material by the Material Data Sheet for that material. (b)(4)(ii)

Revised: 6-11-01

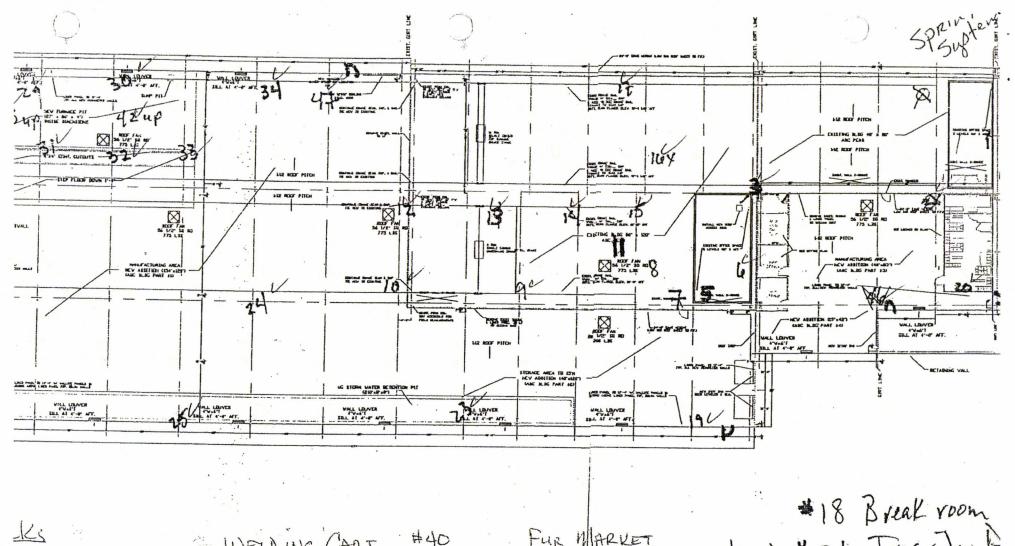
AHT FIRE PREVENTION PLAN - BURTON

Advanced Heat Treat, Corp. shall review with each employee upon initial assignment those parts of the fire prevention plan which the employee must know to protect the employee in the event of an emergency. Additional review(s) are necessary if the fire hazard of the work area is changed or if the employee is re-assigned to an area having different fire hazards.

Copies of the Advanced Heat Treat, Corp. Fire Prevention Plan are located in the Safety Programs Notebooks in the main office and in the shop, and are available for employee review.

Advanced Heat Treat, Corp. requires and encourages participation by all employees with this plan. Any condition that exists, which might contribute to a fire emergency, should be brought to the attention of the Operations Manager.

Revised: 6-11-01 7



WELDING CART #40 Curring Torch #39 FUR MARKET

#35-OHDOOR Westend #21 Inside D

#34-Welding booth #4-Storage

#37-S of walking to storage

#38 Inside E Door #5 OLD LOCK!

44 # 44

FLOOR PLAN

Fire Extinguishers

AS-BUILT 9/28,

AHTC Information Request 5 April form Z.19-3 IND UNIT 100B (Yearly) -(PM) May form Z.19-3 IND UNIT 200A (Yearly) - (PM) IND UNIT 250 (Yearly) - (PM) May form Z.19-3 Pacemaker BA 1500 lbs (Yearly) - (PM) -June form Z.19-4 Temper BB - (Yearly) - (PM) -Jan form Z.19-11 DM Temper BW- (Yearly) - (PM) -Feb form Z.19-10 Temper BV (Yearly) - (PM) -Oct form Z.19-9 Pacemaker BF 500 lbs - (Yearly) - (PM) -May form Z.19-4 Temper BG - (Yearly) - (PM) -April form Z.19-8 Pacemaker BE 750 lbs - (Yearly) - (PM) -Dec form Z.19-4 Temper BJ (Yearly) (PM) Nov. form Z.19-12 Temper BK (Yearly) (PM) Dec form Z.19-14 Temper BD - (Yearly) - (PM) -Oct form Z.19-13 Pacemaker BC 1500 lbs - (Yearly) - (PM) Dec form Z.19-4 Pacemaker BX Feb form Z.19-4 AIR COMPRESSOR -Check Oil level See equipment Monthly (Change oil Jan/April/August/Dec) AIR COMPRESSORS A See Z.35 Send Oil for analysis - each furnace (BA, BF, BE, BC, BX) Dec / June PMs are to be done prior to temperature surveys or calibrations

FIRE EXTINGUISHER & ALARM INSPECTION - MC	ONTHLY V S	See attached N	Лар
LOCATION	DATE INSPECTED	Inspected BY -	STATUS.
Check Fire Extinguishers per Z170 layout attached (17 + 5 on portable units)	1/29/08	Om	OK

Solvent Log Z.53 to Office (monthly) Init.	Lab Filter cked /replace) 12 X 20 X 1 pleated	Init. 0 M	Office Filter cked replace	(monthly)//29/08 Init. DM
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See Equipment Maintenance Log at/with the equipment for: Three Induction units (also see ownership log, calibration forms and calibration logs), two ovens and two walk behind fork lifts.

Attre Information Requests

IND UNIT 100B (Yearly) –(PM)	April	NR	form Z.19-3	+ +
IND UNIT 200A (Yearly) - (PM)	May	NA	form Z.19-3	+ +
IND UNIT 250 (Yearly) - (PM)	May	NA	form Z.19-3	
Pacemaker BA 1500 lbs (Yearly) - (PM) -	June	NA	form Z.19-4	
Temper BB - (Yearly) - (PM) -	Jan	NA	form Z.19-11	
Temper BW- (Yearly) - (PM) -	Feb	NA	form Z.19-10	
Temper BV (Yearly) - (PM) -	Oct	NR	form Z.19-9	
Pacemaker BF 500 lbs - (Yearly) - (PM) -	May	AU,	form Z.19-4	
Temper BG - (Yearly) - (PM) -	April	NA	form Z.19-8	4
Pacemaker BE 750 lbs - (Yearly) - (PM) -	Dec	19/27	form Z.19-4	om
Temper BJ (Yearly) (PM)	Nov.	NA	form Z.19-12	
Temper BK (Yearly) (PM)	Dec	12/27	form Z.19-14	Um
Temper BD - (Yearly) - (PM) -	Oct	NK.	form Z.19-13	1
Pacemaker BC 1500 lbs - (Yearly) - (PM)	Dec	12/26/07	form Z.19-4	Dm
Pacemaker BX	Feb	NA	form Z.19-4	1
AIR COMPRESSOR –Check Oil level (Change oil Jan/April/August/Dec)	Monthly	NA	See equipment	
AIR COMPRESSORS▲		128	See Z.35	
Send Oil for analysis - each furnace (BA, BF, BE, BC, BX)	Dec / June	12/26/07		DM
PMs are to be done prior to temperature surveys or calibration	ns		1	""

FIRE EXTINGUISHER & ALARM INSPECTION - MONTHLY ✓ See attached Map						
LOCATION	DATE	Inspected BY -	STATUS.			
Check Fire Extinguishers per Z170 layout attached (17 + 5 on portable units)	12/26/07	om	OK			

						1725
	(monthly)	7	Lab Filter cked / replace	(monthly)	Office Filter aland	18/10/15
	Init.	1		init o ina	Office Filter cked (replace)	
	A/	1/	12 X 20 X 1 pleated/2/27/7	Init D M	20 X 20 X 1	Init in in
			1 40 40	b . r	ZO NZO NI	W FFI

See Equipment Maintenance Log at/with the equipment for: Three Induction units (also see ownership log, calibration forms and calibration logs), two ovens and two walk behind fork lifts.

IND UNIT 100B (Yearly) –(PM)	April		form Z.19-3	
IND UNIT 200A (Yearly) - (PM)	May		form Z.19-3	
IND UNIT 250 (Yearly) - (PM)	May	-	form Z.19-3	
Pacemaker BA 1500 lbs (Yearly) - (PM) -	June		form Z.19-4	
Temper BB - (Yearly) - (PM) -	Jan		form Z.19-11	
Temper BW- (Yearly) - (PM) -	Feb		form Z.19-10	
Temper BV (Yearly) - (PM) -	Oct	10.2	form Z.19-9	
Pacemaker BF 500 lbs - (Yearly) - (PM) -	May		form Z.19-4	
Temper BG - (Yearly) - (PM) -	April		form Z.19-8	11
Pacemaker BE 750 lbs - (Yearly) - (PM) -	Dec	W	form Z.19-4	V
Temper BJ (Yearly) (PM)	Nov.	12/3/07	form Z.19-12	vm
Temper BK (Yearly) (PM)	Dec	NA	form Z.19-14	NA
Temper BD - (Yearly) - (PM) -	Oct	1	form Z.19-13	1
Pacemaker BC 1500 lbs - (Yearly) - (PM)	Dec		form Z.19-4	
Pacemaker BX	Feb	V	form Z.19-4	11
AIR COMPRESSOR -Check Oil level (Change oil Jan/April/August/Dec)	Monthly	12/3/07	See equipment	DM
AIR COMPRESSORS▲			See Z.35	
end Oil for analysis - each furnace (BA, BF, BE, BC, BX)	Dec / June	MA		MY

FIRE EXTINGUISHER & ALARM INSPECTION - MONTHLY ✓ See attached Map						
LOCATION	DATE	Inspected BY -	STATUS.			
Check Fire Extinguishers per Z170 layout attached (17 + 5 on portable units)	11/29/07	pm	O.K			

Solvent Log Z.53 to Office	(monthly)	Lab Filter cked / replace 12 X 20 X 1 pleated	(monthly) 11/29/6 Office Init. 10 M	ce Filter cked / replace	(monthly) 12/3/07
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See Equipment Maintenance Log at/with the equipment for: Three Induction units (also see ownership log, calibration forms and calibration logs), two ovens and two walk behind fork lifts.



Hazardous Waste Cart with accumulation drum of TCE in foreground.

Information Request 4.

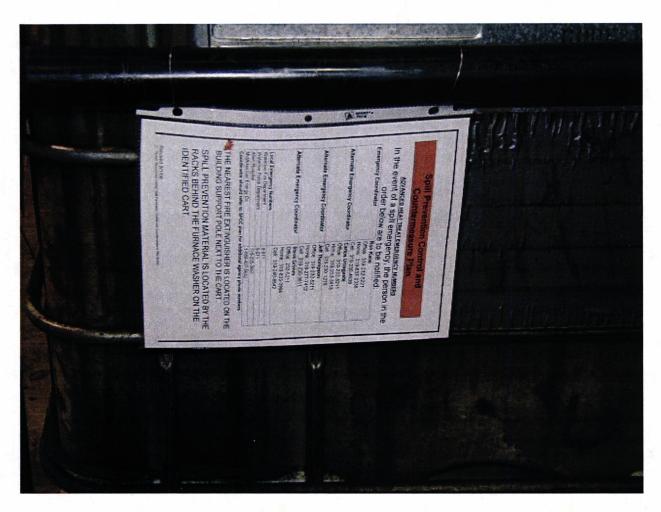


Fire extinguisher and air horn by hazardous waste cart. Information Request Nos. 4 and 6



Production Office Area





Emergency Phone Number on hazardous waste cart - Information Request 8

AHTC Information Request 8 7.0 Spill Response Procedures

7.1 <u>Spill Response Procedures</u> – The following procedures are to be followed whenever oil is released within or outside of the confines of AHTC buildings. If the spill has the potential to leave plant property and/or enter a waterway, that event will be considered an emergency spill situation.

112.7 (a) (3)(vi) & 112.7 (a)(4)

7.1.1 Notification Procedure

• The individual who discovers an oil spill should <u>immediately</u> dial the main plant number and page the emergency coordinator. The emergency coordinator must be contacted immediately for a spill notification. Telephones are located throughout the facility. Telephones are available in all oil product load/unload areas. The facility is small enough that employees may be notified visually of the situation. Provide information on the material spilled or released, the location, estimated quantity of release, direction of release, and if any injuries are involved. Specify if the spill has the potential to leave plant property. The phone numbers of the emergency coordinators responsible for handling oil spills are:

Ron Kane Office: 319-232-5221, Page Ron Kane

Home: 319-637-2338 Cell: 319-230-4936

Carlos Urzagaste Office: 319-232-5221, Page Carlos Urzagaste

Home: 319-233-3815 Cell: 319-230-1279

Jeff Thompson Office: 319-232-5221, Page Jeff Thompson

Home: 319-277-2412 Cell: 319-230-3611

Stephen Grimm Office: 319-232-5221, ext. 221

Home: 319-833-.994 Cell: 319-240-8842

- If the employee is qualified and appropriately trained, he or she may attempt to stop the discharge or defensively block it from entering storm drains or leaving the building.
- The employee should wait by the spill site until the emergency response coordinator gets there. Direct any pedestrian or vehicle traffic out of the path of the spill until that time.
- The emergency coordinator shall report to the spill site and make the determination of whether the incident is within AHTC's emergency capabilities. This individual then contacts the Waterloo Fire Dept. for assistance.
- If the spill is beyond in-house capabilities, the emergency coordinator shall notify the appropriate agencies and personnel listed in Appendix D. If the spill involves the transformer, notify MidAmerican Energy at 1-800-595-5325. If the spill reaches a navigable waterway, the emergency coordinator must contact:
 - a) National Response Center: 800-424-8802
 - b) Iowa DNR Emergency Response Unit: 515-281-8694
 - c) Waterloo Police Dept. Emergency 911
 - d) Waterloo Fire Department: 911

The emergency coordinator should be prepared to deliver the following information to the National Response Center:

- a) Facility name, address, phone number
- b) Name and title of person reporting
- c) Date and time of incident

AHTC Information Request 8

- d) Location of incident
- e) Type and quantity of oil released
- f) Source and cause of oil discharge
- g) Description of all affected media air, water, soil
- h) Damage caused by the discharge
- i) Spill response actions to stop, mitigate, and remove effects of discharge
- j) Agencies and organizations contacted
- k) Threat to surrounding neighborhood or local citizens. Is an evacuation needed?
- 1) Weather conditions
- m) Telephone numbers where people can be reached for more information

112.7 (a)(3)(iv)

7.1.2 Spill Response Procedure

- Evacuate the incident area as needed. Put warning tape around the spill perimeter to keep untrained personnel out of the area. If outside, keep people upwind of the release.
- Have response personnel don the appropriate personal protective equipment.
- Initiate spill containment measures using oil absorbent and other equipment as needed.
- Set up portable pumps to pump spilled material into containers or oil storage tanks, as needed.
- After the liquid has been largely removed, clean up the spill area using absorbents, brooms, pads, shovels, or any other necessary equipment to leave the spill area in good clean condition.
- Ideally, all spill cleanup materials should be placed in DOT 55-gallon drums, so they can be shipped to an appropriate treatment, storage, and disposal facility.
- The Waterloo Fire Department will handle any spills involving fire or those beyond AHTC's capability.
- Emergency coordinator completes Spill Event Information Form in Appendix F and any written
 reports required by local, state or federal agencies. Note spill on record in Appendix G if spill
 was reportable to IDNR or the NRC. A follow-up report to the National Response Center is
 required within 15 days of telephone notification of the release.
- 7.1.3 <u>Transformer Spill Response Procedure</u> In the event there is an oil release by the transformer at AHTC, the following procedure will be initiated:
 - Contact MidAmerican Energy Co. at 1-800-595-5325 and report a spill of oil.
 - Contain as able.
- 7.1.4 <u>Emergency Spill Response Equipment</u> The following emergency response equipment is maintained at the AHTC site:

Fire extinguishers
First aid supplies
Floor Dri Oil absorbent
DOT 55-gallon closed top and open top drum and 275 gallon totes
Shovels, brooms, mops, squeegees, and buckets
Personal Protective Equipment including boots, face shields, and gloves

112.7 (a)(3)(v)

7.1.5 <u>Disposal of Recovered Materials</u> – Materials recovered from oil releases are disposed in accord with local, state, and federal requirements. Recovered oil soaked solids are placed in DOT approved 55-gallon drums and oil absorbents and discarded PPE are placed in open top DOT approved 55-gallon and managed through Hydrite Chemical in Waterloo. Used oil is picked up by Cedar Falls Oil, and used to make asphalt or burned in furnaces.